

Honorable John H. Chun

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

KURT BENSHOOF, ARW. By and Through  
His Father, KURT A. BENSHOOF,

Plaintiffs,

v.

MARSHALL FERGUSON, *et al.*,

Defendants.

No. 2:24-cv-00808-JHC

DECLARATION OF SARAH MACK IN  
SUPPORT OF JESSICA A.  
SKELTON'S MOTION FOR  
SANCTIONS

I, Sarah S. Mack, declare as follows:

1. I am a partner at Pacifica Law Group LLP ("PLG") and counsel of record in this matter for Defendant Jessica A. Skelton. I am over the age of eighteen, have personal knowledge of the matters herein and am competent to testify in this case.

2. Attached hereto as **Exhibit A** are true and correct copies of email correspondence from Kurt Benshoof to Defendant Skelton and the undersigned counsel regarding ongoing litigation.

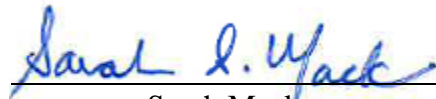
3. To date, Skelton, her clients and the undersigned counsel have incurred more than \$70,000 in attorneys' fees and costs to defend against Plaintiff Benshoof's various claims and counterclaims. Attached hereto as **Exhibit B** is a true and correct copy of a billing summary of

1 these fees to date.

2 4. On June 27, 2024, the undersigned counsel provided notice to Plaintiff Benshoof  
3 that Defendant Skelton would be seeking sanctions against him for his frivolous action, and  
4 provided 21-days in which he could withdraw his Complaint. He chose not to do so. Attached  
5 hereto as **Exhibit C** is a true and correct copy of that email correspondence.  
6

7  
8 I declare under penalty of perjury under the laws of the State of Washington that the  
9 foregoing is true and correct.

10 EXECUTED this 19<sup>th</sup> day of July, 2024, at Seattle, Washington.  
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13 Sarah Mack  
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# EXHIBIT A

From: [kurt benshoof](#)  
To: [Sarah Mack](#); [Jessica Skelton](#)  
Subject: Lock Them Up and Throw Away the Key.  
Date: Tuesday, January 16, 2024 9:56:43 PM  
Attachments: [MACK - Lock Them Up and Throw Away the Key.pdf](#)

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Good morning,

Do either of you find it ironic that Sarah E. Spierling (could this be *the* Sarah E. Spierling Mack?!) wrote the following statement in the Journal of Law and Policy, Vol. 9, Issue 3, Art. 6, pg. 880 (2001):

***"The threat of harm must be real and present and the burden of proof to establish dangerousness (to self or others) must be clear and convincing."***

Do either of you find the actions by Counterclaim Defendants, and their co-conspirators in the City and County, to persecute and maliciously prosecute me over the last two years and four months, in contradiction to Ms. Spierling's writing in the Journal of Law and Policy?

Have you seen *clear and convincing evidence* of a *real and present threat of harm* that I have *ever* posed to my son?

Can you show me *anywhere* in Ms. Owen's perjury-filled court statements in which she ever alleged I yelled at my son, let alone spanked him? No, you cannot. [REDACTED] has been my baby boy from the moment the doctor handed him to me in the delivery room. Ms. Owen actually chided me for being *too* soft and nurturing. Who snuggled [REDACTED] to bed most nights? That was *me*, aka "Papa snuggles." I went to massage school---Brian Utting School of Massage---and was a Licensed Massage Practitioner back in the 1990's. I understand the sacred connection and nurturing energy of holding your own child as well as any mother does. Therefore, when I hear nitwits and liars claim that I have been anything but an awesome Dad to my son, I can only roll my eyes. Who did [REDACTED] compare me to? Jim Carey. Cuz I'm a lovable goofball. Or, as [REDACTED] would call me, "Silly Papa."

What you can find if you actually look through Ms. Owen's court declarations, is lots of evidence that Ms. Owen is a pathological liar and sociopathic narcissist who is practiced at acting---from her years of whoring. She plays the crowd well, but her lies wither under scrutiny.

This is why so many of her fellow criminals in Seattle need to keep Ms. Owen as far from a videotaped deposition as possible: a lot of bullshit narratives are going to unravel once Ms. Owen is deposed under oath, and that unraveling is going to expose a lot of people as her co-conspirators and accessories after-the-fact.

Maybe I'm mistaken: maybe this was a *different* Sarah E. Spierling who penned the attached article. Who knows?

Please stop aiding and abetting the ongoing abuse of my son.

In Truth & Spirit,  
Reverend Kurt Benshoof

“Cowardice asks the question, 'Is it *safe*?' Expediency asks the question, 'Is it *politic*?' Vanity asks the question, 'Is it *popular*?' But, conscience asks the question, 'Is it *right*?' And there comes a time when one must take a position that is neither safe, nor politic, nor popular, but one must take it because one's conscience tells one that *it is right*.”

---Rev. Dr. Martin Luther King, Jr.

*"It's easier to build strong children than to repair broken men."*

---Frederick Douglass

*"Mercy for the guilty is cruelty to the innocent."*

---Adam Smith

*"It's amazing how much panic one honest man can spread among a multitude of hypocrites."*

---Thomas Sowell

**From:** [kurt.benshoof](#)  
**To:** [Jessica Skelton](#)  
**Cc:** [Sarah Mack](#)  
**Subject:** Re: WAWD No. 2;23-cv-01829-JHC - Rule 26(f) Conference  
**Date:** Tuesday, January 16, 2024 4:10:43 PM

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Ms. Skelton,

It's amusing to read your prevarications which feign dutiful concern for doing what is "appropriate" while you and your co-conspirators continue to act as accessories after the fact to numerous crimes which I have previously documented, so that you and your co-conspirators can continue to violate RCW 9A.28.040, deny my rights, and facilitate the ongoing abuse of my son.

As I've said before, "Cut the bullshit." You aren't fooling anyone.

On Tuesday, January 16, 2024, Jessica Skelton <[Jessica.Skelton@pacificallawgroup.com](mailto:Jessica.Skelton@pacificallawgroup.com)> wrote:

Mr. Benshoof:

Given the pending motion to dismiss, and that Judge Chun has not yet issued his Order Regarding Initial Disclosures containing our discovery deadlines, Counter-Defendants do not believe it is appropriate to engage in a discovery conference until the motion has been resolved.

Thanks,

Jessica

**Jessica A. Skelton**

Partner

Pronouns: she/her



**T** 206.245.1700 **F** 206.245.1750

1191 2<sup>nd</sup> Avenue, Suite 2000, Seattle, WA 98101-3404

[Jessica.Skelton@PacificaLawGroup.com](mailto:Jessica.Skelton@PacificaLawGroup.com)

This electronic message contains information from the law firm of Pacifica Law Group LLP. The contents may be privileged and confidential and are intended for the use of the intended addressee(s) only. If you are not an intended addressee, note that any disclosure, copying, distribution, or use of the contents of this message is prohibited. If you have received this e-mail in error, please contact me at [jessica.skelton@pacificallawgroup.com](mailto:jessica.skelton@pacificallawgroup.com).

**From:** kurt benshoof <[kurtbenshoof@gmail.com](mailto:kurtbenshoof@gmail.com)>

**Sent:** Thursday, January 11, 2024 8:02 PM

**To:** Sarah Mack <[Sarah.Mack@pacificallawgroup.com](mailto:Sarah.Mack@pacificallawgroup.com)>; Jessica Skelton <[jessica.skelton@pacificallawgroup.com](mailto:jessica.skelton@pacificallawgroup.com)>

**Subject:** WAWD No. 2;23-cv-01829-JHC - Rule 26(f) Conference

Good evening,

When are you available for our Rule 26(f) Conference? As you both likely suspect, Counterclaim Plaintiffs are keenly interested in expediting the production of records relevant to our counterclaims. My schedule is wide open, so please inform me of your earliest availability. Can we get [REDACTED] on the call, as well?

In Truth & Spirit,

Reverend Kurt Benshoof

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---Frederick Douglass

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---Thomas Sowell



**From:** [kurt.benshoof](#)  
**To:** [Sarah Mack](#); [Jessica Skelton](#); [Michael Tracy](#); [Sarah Turner](#); [alwaysisobella@protonmail.com](#); [solanasparks@protonmail.com](#); [Blair Russ](#); [Jeff M. Admon](#)  
**Subject:** 2:23-cv-01829-JHC  
**Date:** Wednesday, January 24, 2024 9:47:22 AM  
**Attachments:** [197111049335.pdf](#)

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Good morning,

Attached is Counterclaim Plaintiffs' First Amended Counterclaim.

The Willful and Wanton Misconduct regarding class A felony Kidnapping RCW 9A.40.020, and class B felony Rendering Criminal Assistance RCW 9A.76.070, aren't a good look for any of you, or your clients.

Next up is immediate hearing of an emergency injunction to stop you and your clients from continuing your crimes.

And, if needed, Discretionary review by the 9th Circuit.

Irreparable Harm has been evidenced.

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In Truth & Spirit,  
Reverend Kurt Benshoof

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**From:** [kurt.benshoof](#)  
**To:** [Dawn Taylor](#); [Sarah Mack](#); [Narver, Gregory C](#)  
**Cc:** [Jessica Skelton](#)  
**Subject:** Re: Benshoof v. Cliber, et al.; 22-2-15958-8: Motion for Dismissal for Violation of Vexatious Order  
**Date:** Friday, March 29, 2024 5:51:07 PM

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Aside from the fact that you all know the Order Restricting Abusive Litigation was fraudulent and void *ab initio*, there are a couple other questions to be asked:

Are you aware that KCSC No. 22-2-15958-8 was closed and appealed on March 3, 2023, which is now Washington Court of Appeals No. 85092-0-I?

Are you aware that Gregory C. Narver was not a party to KCSC No. 22-2-15958-8?

Are you criminally insane, or just mentally retarded? It's difficult to discern the difference.

In Truth & Spirit,  
Reverend Kurt Benshoof

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---Thomas Sowell

On Fri, Mar 29, 2024 at 3:04 PM Dawn Taylor <[Dawn.Taylor@pacificallawgroup.com](mailto:Dawn.Taylor@pacificallawgroup.com)> wrote:

Good afternoon.

On behalf of Jessica A. Skelton, attached please find documents filed today in regards to the above-referenced matter.

Should you have any difficulties with the attachments, please do not hesitate to contact me.

Thank you.

Dawn M. Taylor

Assistant to Paul J. Lawrence,

Sarah C. Johnson, Sarah S. Mack,

Jacob A. Zuniga, W. Scott Ferron

& Noe Merfeld



**T** 206.245.1700 **D** 206.245.1701 **F** 206.245.1750

1191 Second Avenue, Suite 2000, Seattle, WA 98101-3404

[dawn.taylor@pacificallawgroup.com](mailto:dawn.taylor@pacificallawgroup.com)

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From: [kurt.benshoof](#)  
 To: [Jessica Skelton](#); [Narver, Gregory C](#); [Sarah Mack](#)  
 Subject: KCSC No. 24-2-06539-3 SEA; WAWD Nos. 2:23-cv-1829-JNW; 2:24-cv-????-???  
 Date: Friday, April 5, 2024 4:43:55 PM

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Happy Friday!

Since you all act as if playing stupid is a functionable legal strategy, let me recap what is evidenced across numerous court cases. Facts which have not been, and cannot be, denied. As in, subject to judicial notice of adjudicative facts under ER 201.

1. Jessica Owen threatened me BY TEXT message to kidnap my son, steal my car, defraud me of my home and extort me for money on August 16, 2021. I even texted her back, "Did you just threaten me?" Owen, being a narcissistic borderline, was stupid enough to reply, "Definitely." OOPS. That's irrefutable evidence of *mens rea*.
2. On September 3, 2021, Owen's girlfriend (and fellow prostitute perjurer) Magalie Lerman kidnapped my son (18 U.S.C. § 1201) and stole my car.
3. Nathan Cliber suborned Jessica Owen's perjury in KCSC No. 21-5-00680-6 SEA.
4. Gregory Narver's September 30, 2021, email to me confirmed that Narver knew that Jessica Owen perjured herself a class B felony under RCW 9A.72.050 by making inconsistent material statements of fact.
5. Owen's and Lerman's friend, Owen Hermsen, attempted to extort me, as well as bribing a witness, for \$19,000 BY TEXT message, in exchange for the return of my stolen car and "allowing" me eight (8) days per month with my son, A.R.W.
6. In October 2023, Narver communicated with Cliber and Blair Russ about violating RCW 28A.605.030 to deny my right to the records of A.R.W. They conspired (RCW 9A.28.044, class C felony) to lend criminal assistance (RCW 9A.76.070, class B felony) to the ongoing kidnapping by Lerman and Owen of my son. (RCW 9A.40.20, class A felony).
7. Then, under the ruse that Seattle Public Schools was trying to protect my son, Pacifica Law Group filed a bogus Petition for Declaratory Judgment.
8. On January 23, 2024, Counterclaim Plaintiffs filed Amended Counterclaim.
9. Judge Whitehead acted *ultra vires* to have the U.S. District Court Clerk violate Fed.R.Civ.P. 4 by refusing to issue summonses. To date, the Clerk is still refusing to issue summonses for Defendants Lerman and King County. The doctrine of absolute judicial immunity does to extend to cover acts outside of Whitehead's official duties. OOPSIES!
10. Now, ya'all are trying to grant yourselves immunity from suit under the fraudulent Order Restricting Abusive Litigation ("ORAL"). That ORAL was granted by corrupt Judge Marshall Ferguson. The transcript of the January 27, 2023, hearing proves that Ferguson engaged in *ex parte* communication with opposing counsel to give them legal advice. Not just any legal advice---advice to falsely see an ORAL under RCW 26.51. Problem is, Ferguson and his co-conspirators in the fraud never had the statutory authority for an ORAL, pursuant to RCW 26.51.030, nor did Ferguson hold a hearing to allow my testimony pursuant to the requirement of RCW 26.51.040.
11. BUT, since you're all CRIMINALS, you have no reservation about trying to grant yourselves immunity for your crimes underneath the fraudulent ORAL issued by corrupt Marshall Ferguson, despite the fact Narver, Seattle Public Schools, and Pacifica Law Group were not parties to KCSC No. 22-2-15958-8. This may be the funniest thing I have ever seen argued by attorneys, and I have seen some really stupid shit.

CONCLUSION #1: Ya'all dug yourselves a *really deep hole*.

CONCLUSION #2: Ya'all won't stop lying and committing crimes until: (1) you are arrested; or (2) you are brought to the witness stand in a civil trial and you are exposed before a jury of your peers. (I'm hoping these trials are televised)

You were given the opportunity to engage in pre-litigation discussions, yet you refused. Okey-Dokey!

In Truth & Spirit,  
Reverend Kurt Benshoof

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**From:** [kurt.benshoof](#)  
**To:** [Narver, Gregory C.](#); [Sarah Mack](#); [Jessica Skelton](#)  
**Subject:** 2:23-cv-1829-JNW  
**Date:** Thursday, April 11, 2024 11:57:58 AM

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Happy Thursday!

Look what I found regarding your “forum shopping” attempt to seek a declaratory judgment to indemnify Gregory’s lending of criminal assistance to the perjuring whores—Jessica R. Owen and Magalie E. Lerman—who kidnapped my son:

“Second, there is a concern that parties could attempt to avoid state court proceedings by filing declaratory relief actions in federal court. This kind of forum shopping could be avoided by requiring district courts to inquire into the availability of state court proceedings to resolve all issues without federal intervention. *Id.* at 495, 62 S.Ct. at 1175.”

*Chamberlain v. Allstate Ins. Co.*, 931 F.2d 1361, 1367 (9th Cir. 1991)

Good luck with your criminal conspiracy! It’s going to be really entertaining to watch it implode on you.

--

In Truth & Spirit,  
Reverend Kurt Benshoof

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**From:** [kurt benshoof](#)  
**To:** [Narver, Gregory C.](#); [Jessica Skelton](#); [Sydney Henderson](#); [Sarah Mack](#); [Dawn Taylor](#)  
**Cc:** [Blair Russ](#); [Jeff M. Admon](#); [Sarah Turner](#); [Michael Tracy](#)  
**Subject:** KCSC No. 24-2-06539-3 SEA  
**Date:** Friday, April 26, 2024 2:23:22 PM  
**Attachments:** [2023-3-31--Order Vexatious Litigant.pdf](#)

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Happy Friday!

I'm going to try to speak very slowly so that you  
can....all....under....stand....what....I....am.....explaining.....to....you.

I'm also attaching the [fraudulent] Order Restricting Abusive Litigation by Kurt Benshoof ("ORAL"), dated March 31, 2023.

Even IF the ORAL was not fraudulent, I'm going to explain how laughably absurd your circular "logic" is.

**Filing Restriction No. 6:** "If Mr. Benshoof fails to abide by the terms of this Order, any *party* may move, or the Court sua sponte may move, for a finding of contempt and sanctions."  
(ORAL, page 6 ¶5)

As the Response from Ms. Skelton admitted yesterday, "Narver filed his Motion for Dismissal in the above-captioned matter based on Filing Restriction No. 6 in the Order Restricting Abusive Litigation of Kurt Benshoof ("Vexatious Litigant Order") in this matter. Narver's status as a *non-party* is irrelevant to resolution of [Narver's] Motion."

We can all agree that henceforth Ms. Skelton is collaterally estopped from claiming that Narver is a "party."

Ms. Skelton has claimed that Filing Restriction No. 6 authorizes Narver to move for dismissal of KCSC No. 24-2-06539-3. This is comical.

The ORAL, even if it were valid, could only authorize a *party* to motion for a *finding of contempt or sanctions*.

**PROBLEM #1:** Narver is admittedly not a "party."

This means that Filing Restriction No. 6 doesn't do jack shit for Mr. Narver unless a *party* moves for sanctions on behalf of Mr. Narver. Did that happen? No.

**PROBLEM #2:** Contempt and Sanctions cannot act as a Rule 12 dismissal.

Are you really this retarded? You're acting as if having the (allegedly valid) authority to *impose fines* on me can also act as a bar to prosecution of the mandamus and an affirmative defense. Did you actually graduate from law school, or did you all just buy diplomas off of the internet?

On the bright side, thank you for the entertainment!!!! There are people around the country laughing with me at how totally fucking retarded attorneys are in Seattle.

In Truth & Spirit,  
Reverend Kurt Benshoof

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**From:** [kurt benshoof](#)  
**To:** [LePierre, Dallas](#); [Riedo, Catherine E](#); [AFB](#); [Sarah Turner](#); [Michael Tracy](#); [Darren Feider](#); [Matthew Coughlan](#); [Yand, James](#); [Johnson, James E.](#); [Blair Russ](#); [Jeff M. Admon](#); [katrinaoutland@gmail.com](#); [Sarrafan, Sohella F](#); [Owen Hermesen](#); [Wu, Peggy \(PAO\)](#); [Sarah Mack](#); [J Owen](#); [alwaysisobella@protonmail.com](#); [solanasparks@protonmail.com](#); [Magali Lerman](#); [Jessica Skelton](#)  
**Subject:** WAWD No. 2:23-cv-1392-JNW; Notice of Pendency of Other Actions  
**Date:** Wednesday, May 22, 2024 10:56:53 AM  
**Attachments:** [2024-05-22 Document 208 PLAINTIFF Notice Pendency Other Action - U.S. 23A933 U.S. 23-7523.pdf](#)

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Happy Wednesday!

Please see the attached Notice of Pendency of Other Actions e-filed today. (Dkt. #208)

Please be advised that attorneys admitted as members of Bar of the United States Supreme Court, ones who have suborned the perjury of their clients in violation of 18 U.S.C. § 1622, may be subject to disbarment or other disciplinary action, pursuant to Supreme Court Rule 8. The Petition for Writ of Certiorari may have mentioned that Mr. Darren Feider suborned the perjury of Defendant Zachary Cook in U.S. No. 23-7523, but I can't remember off the top of my head.

Furthermore, please be advised that U.S. No. 23A933 and U.S. No. 23-7523 will not be the last cases docketed at the United States Supreme Court regarding the criminal law violations and rights violations which have been, and are being, perpetrated by Defendants and their counsel; therefore, you may wish to take heed if you don't want to be subject to "an order suspending that member from practice before this Court." (Sup. Ct. Rule 8.1) In layman's terms: "Play stupid games, win stupid prizes." (aka #FAFO)

However, maybe you don't have anything to worry about... I mean, how many years has it been since the SCOTUS actually heard a case brought by a *pro se*? Forty? Fifty? You should be fine. Right?

In Truth & Spirit,  
Reverend Kurt Benshoof

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**To:** [LePierre, Dallas](#); [Riedo, Catherine E](#); [AFB](#); [Sarah Turner](#); [Michael Tracy](#); [Darren Feider](#); [Matthew Coughlan](#); [Yand, James](#); [Johnson, James E.](#); [Wu, Peggy \(PAO\)](#); [Blair Russ](#); [Sarah Mack](#); [Sarrafan, Soheila E](#); [katrinaoutland@gmail.com](#); [Jeff M. Admon](#); [solanasparks@protonmail.com](#); [alwaysisobella@protonmail.com](#); [Owen Hermsen](#); [spdglu@seattle.gov](#); [Magali Lerman](#); [J Owen](#)  
**Cc:** [Briana Gage](#)  
**Subject:** Re: WAWD No. 2:23-cv-1392-JNW  
**Date:** Friday, May 24, 2024 11:29:13 AM

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Happy Friday!

Pursuant to FRAP 8(a)(2)(C) you are hereby given reasonable notice of Benshoof's forthcoming Motion for Injunction under FRAP 8(a)(1)(C) while the indirect appeal regarding Benshoof's Sixth TRO (D.C. Dkt. #158) is pending before the 9th Circuit. (No. 24-3053, DktEntry 1.1) You will be emailed the Motion immediately prior to my filing it into 9th Cir. No. 24-3053.

The Motion for Injunction will show that "a motion having been made, the district court failed to afford the relief requested" pursuant to FRAP 8(a)(2)(A)(2).

Defendants Ann Davison, Katrina Outland, and Soheila Sarrafan have refused to stop rendering criminal assistance (RCW 9A.76.070) to the ongoing kidnapping (RCW 9A.40.020) and abuse of my minor son being perpetrated by Defendants Jessica Owen and Magalie Lerman.

The City continues to maliciously prosecute me (RCW 9.62.010) under SMC Nos. 669329, 671384, et al., despite irrefutable evidence that Defendant Nathan Cliber suborned the perjury of Defendant Jessica Owen in KCSC No. 21-5-00680-6 SEA, which was the fraudulent basis upon which Defendants Cliber and Owen obtained a void *ab initio* Final Restraining Order from Defendant David Keenan..

The City continues to ignore the sworn statements of my minor son, A.R.W. (Dkt. #13-2, pg. 48-54), confirming that Jessica Owen and Magalie Lerman are pathological liars, perjurers, kidnappers, and child abusers, who have used my son as a pawn to attempt felony extortion of me, aided and abetted by Defendants Owen Hermsen, Blair Russ, and Moshe Admon. (Just to name a few!)

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You can all expect Benshoof's forthcoming motion to the 9th Circuit to plead familiar facts and law which you have all been previously served. (D.C. Dkt. #158; Application for Writ of Habeas Corpus to Justice Elena Kagan, etc.)

Tick Tock. Justice is coming.

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shopping bags, my groceries, and \$5,000. SPD Incident #2021-133210. Officer B. Welborn, #6689 and two female officers responded. All three officers violated RCW 9A.40.040 by unlawfully imprisoning me under color of law, despite me graciously informing them of the laws they were violating and offering them the opportunity to retract their threats without consequence. Ofc. Welborn and his fellow officers chose not to.

Well, I have all of the GoPro video from that day, which recorded everything from the moment I got out of my car and put the \$5,000 of money orders into *my* own shopping bags I had brought from home. Will Mr. Feider provide me with the name of the Hispanic male manager who violated RCW 9A.56.030 Theft in the first degree, a class B felony? Since Plaintiffs' have filed Notice of Intent to File Second Amended Claim, isn't it convenient that the three-year statute of limitation has not expired for the aforementioned individuals?

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- 1) Western Union International Bank is a bank. [About us | Western Union Bank](#)
- 2) The \$5,000 of Western Union Money orders were financial instruments of \$5,000 "belonging to, or in the care, custody, control, management, or possession of" Western Union International Bank on May 30, 2021. *See* 18 U.S.C. § 2113(a) Bank robbery and incidental crimes: [18 U.S. Code § 2113 - Bank robbery and incidental crimes | U.S. Code | US Law | LII / Legal Information Institute \(cornell.edu\)](#)
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You will all be provided the Vimeo video links later today regarding May 30, 2021. Keep using the Michael Cohen schtick. It's amusing to watch.

Oh, and in case anyone has forgotten, the City's unlawful imprisonments and malicious prosecutions of me for grocery shopping at Sprouts and PCC were used by Defendants Nathan Cliber, David Keenan, and Jessica Owen to kidnap my son, after which Jessica Owen and Owen Hermsen attempted extortion. Yup, kidnapping and extortion are also "racketeering activities." Oh, and then Mr. Hermsen attempted to bribe me to drop all legal actions. Gee whiz, bribery is also a "racketeering activity." Of course, the City of Seattle has refused to charge any of these criminals for their crimes, despite irrefutable text message evidence. Not a good look for the City Attorney's Office, is it?

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**From:** [kurt benshoof](#)  
**To:** [LePierre, Dallas](#); [Riedo, Catherine E](#); [AFB](#); [Sarah Turner](#); [Michael Tracy](#); [Darren Feider](#); [Matthew Coughlan](#); [Yand, James](#); [Johnson, James E.](#); [Wu, Peggy \(PAO\)](#); [Blair Russ](#); [Sarah Mack](#); [Sarrafan, Soheila E](#); [katrinaoutland@gmail.com](#); [Jeff M. Admon](#); [solanasparks@protonmail.com](#); [alwaysisobella@protonmail.com](#); [Owen Hermesen](#); [spdglu@seattle.gov](#); [Magali Lerman](#); [J Owen](#); [Newsroom@epochtimes.com](#); [fox13tips@fox.com](#)  
**Cc:** [Briana Gage](#)  
**Subject:** Re: WAWD No. 2:23-cv-1392-JNW  
**Date:** Saturday, May 25, 2024 2:32:12 PM  
**Attachments:** [2024-05-25 Petition Writ Habeas Corpus.pdf](#)  
[APPENDICES - Redacted.pdf](#)

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Happy Saturday!

Since Clerk Scott Harris returned my Application for Writ of Habeas Corpus due to my misinterpretation of the Court's jurisdiction, I decided to re-write it as an original jurisdiction Petition for Writ of Habeas Corpus.

Please see the attached Petition and Appendices, being mailed to Clerk Scott Harris and to Respondents.

BTW---it appears someone has had the IT department at the City block my emails, so if one of you could forward my emails to Mr. LePierre and Ms. Riedo, that would great!

Anyone seen my son? It's interesting how all of you act---or fail to act---as if child abuse and kidnapping children isn't right below murder and rape. But, then again, *you're attorneys....*or the kidnapers....or accessories.

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On Fri, May 24, 2024 at 11:28 AM kurt benshoof <[kurtbenshoof@gmail.com](mailto:kurtbenshoof@gmail.com)> wrote:  
Happy Friday!

Pursuant to FRAP 8(a)(2)(C) you are hereby given reasonable notice of Benshoof's forthcoming Motion for Injunction under FRAP 8(a)(1)(C) while the indirect appeal

regarding Benshoof's Sixth TRO (D.C. Dkt. #158) is pending before the 9th Circuit. (No. 24-3053, DktEntry 1.1) You will be emailed the Motion immediately prior to my filing it into 9th Cir. No. 24-3053.

The Motion for Injunction will show that "a motion having been made, the district court failed to afford the relief requested" pursuant to FRAP 8(a)(2)(A)(2).

Defendants Ann Davison, Katrina Outland, and Soheila Sarrafan have refused to stop rendering criminal assistance (RCW 9A.76.070) to the ongoing kidnapping (RCW 9A.40.020) and abuse of my minor son being perpetrated by Defendants Jessica Owen and Magalie Lerman.

The City continues to maliciously prosecute me (RCW 9.62.010) under SMC Nos. 669329, 671384, et al., despite irrefutable evidence that Defendant Nathan Cliber suborned the perjury of Defendant Jessica Owen in KCSC No. 21-5-00680-6 SEA, which was the fraudulent basis upon which Defendants Cliber and Owen obtained a void *ab initio* Final Restraining Order from Defendant David Keenan..

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**Subject:** Re: WAWD No. 2:23-cv-1392-JNW  
**Date:** Monday, June 3, 2024 2:58:37 PM  
**Attachments:** [2024-06-03 Document 228 PLAINTIFFS Reply Entry Default KEENAN Individual \(Dkt 224\).pdf](#)

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Happy Monday!

See attached. Plaintiffs' Reply (Dkt. #228) to Ms. Wu's nonsense. (Dkt. #227)

Do years of pathological lying cause the sort of psychosis some of you are exhibiting the clinical presentation of? I'm honestly trying to understand the ongoing behavior. Is there any temporal correlation to the usage of pronouns or the oxygen deprivation and brain damage caused by prolonged mask wearing?

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On Mon, Jun 3, 2024 at 10:23 AM kurt benshoof <[kurtbenshoof@gmail.com](mailto:kurtbenshoof@gmail.com)> wrote:

"Plaintiffs also failed to follow the Local Civil Rules of this District in seeking a default. LCR 55(a) provides the following: .....However, in the case of a defaulting party who has entered an appearance, the moving party must give the defaulting party written notice of the requesting party's intention to move for the entry of default at least fourteen days prior to filing its motion and must provide evidence that such notice has been given in the motion for entry of default. LCR 55(a) Plaintiffs ignored the requirements of LCR 55(a) and failed to provide counsel notice of their intent to move for an entry of default at least 14 days prior to filing the motion. As a result, Plaintiffs' request for default should be denied." (Dkt. #227, pg 4)

See what Ms. Wu did there? She pretended that, by her filing an appearance on behalf of JUDGE David Keenan, that she had also filed an appearance on behalf of individual Defendant David Keenan. Upon that lie, she then claimed that Plaintiffs' Motion for Entry of Default by ***Individual*** Defendant David Keenan was improper under LCR 55(a).

*ha. ha. ha. ha. ha.*

Ms. Wu, please seek psychiatric help. It doesn't matter if **you** believe what you are writing, or if you are simply delusional enough to believe that **others** will believe what you are writing. Either way, it is **delusional**. Your delusions are wasting the Court's time, they're wasting my time, they're an embarrassment to your profession, they're an embarrassment to KING COUNTY, and they're a violation of 18 U.S.C. §1512(b) under 18 U.S.C. §1962.

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On Mon, Jun 3, 2024 at 10:13 AM kurt benshoof <[kurtbenshoof@gmail.com](mailto:kurtbenshoof@gmail.com)> wrote:  
Happy Monday!

There is a pattern of criminal misconduct which attorneys employed by CITY OF SEATTLE and KING COUNTY continue to engage in, despite my communications. Today, Ms. Wu has filed a Response "on behalf of Judge David Keenan" (Dkt. #227) in which Ms. Wu pretends that Plaintiffs' Service of Publication to David Keenan in his individual capacity was service to JUDGE David Keenan in his official capacity. Come on. Ms. Wu can't be so stupid as to not understand plain English. Which means, unfortunately, that Ms. Wu is stupid enough to attempt to MISLEAD, MISQUOTE and LIE on the record.

“As long as the government entity receives notice and an opportunity to respond, an official-capacity suit is, in all respects other than name, to be treated as a suit against the entity.”  
*Kentucky v. Graham*, 473 U.S. 159, 165–66 (1985).

Naming JUDGE Keenan in his official capacity was the same as naming KING COUNTY. This is contradistinguished from suing David Keenan in his **individual**

capacity for Keenan's *ultra vires* acts. **Duh.**

The phrase "persons acting under color of law" draws on one of the most well-known civil rights statutes: 42 U.S.C. § 1983. That statute applies to "person[s] ... under color of any statute," and this Court has long interpreted it to permit suits against officials in their **individual** capacities. See, e.g., *Memphis Community School Dist. v. Stachura*, 477 U.S. 299, 305–306, and n. 8, 106 S.Ct. 2537, 91 L.Ed.2d 249 (1986). *Tanzin v. Tanvir*, 141 S. Ct. 486, 490-91 (2020)

Ms. Wu falsely stated that "Plaintiffs filed a motion for default against **Judge** Keenan. Dkt. #224." (Dkt. #227, pg. 2)

Ms. Wu is doing this in order to pretend that she has the authority to represent David Keenan the individual, and that individual and official capacity are one and the same. They are not, and she does not have the authority to be spending public money attempting to weasel Dave out of being defaulted in his individual capacity.

King County Code 2.21 CLAIMS AGAINST **COUNTY**. Is David Keenan the individual "the COUNTY"? No.

King County Code 2.21.050(B)(1) states that Ms. Wu is only authorized to defend claims against KING COUNTY **Officials** for their acts within the scope of their official duties which were done in good faith, and which the official has "no reasonable cause to believe the conduct was unlawful." Ms. Wu is now misappropriating public funds, in violation of RCW 42.20.070, but pretending to be representing David Keenan in his individual capacity.

Gee whiz. I'm pretty sure I informed Keenan that it was unlawful for him to deny me the right to enter courtrooms. I'm pretty sure Keenan knows that acting as an accessory after-the-fact to Cliber suborning Owen's perjury is a crime under 18 U.S.C. § 3. Wasn't Dave also a federal law enforcement officer for over a decade, before becoming a judge? Does Dave think he is a law unto himself whenever he puts on his black robe? I'm pretty sure Dave, as a judge, understands that a court needs jurisdiction to act. Dave never had jurisdiction over my son and I, as "domestic relations" never existed between Owen and I.

As a caution to anyone else stupid enough to keep misappropriating public funds, I advise Ms. Wu to withdraw her fraudulent Response, or correct all of her lies and misleading statements. Yaknow, those false or misleading statements to a public official which constitute a criminal violation of RCW 9A.76.175?

This clown show just keeps getting more ridiculous by the day.

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---Frederick Douglass

*"Mercy for the guilty is cruelty to the innocent."*

---Adam Smith

*"It's amazing how much panic one honest man can spread among a multitude of hypocrites."*

---Thomas Sowell

On Sat, Jun 1, 2024 at 11:03 PM kurt benshoof <[kurtbenshoof@gmail.com](mailto:kurtbenshoof@gmail.com)> wrote:  
Happy Saturday!

Please see the attached Motion, Appendix, and [Proposed] Order Granting Plaintiffs' Motion for Entry of Default by individual Defendant Jenny A. Durkan. (Dkt. #226)

Has anyone heard from Julie Kline? I left her a voicemail, but never heard back.

In Truth & Spirit,  
Reverend Kurt Benshoof

"Cowardice asks the question, 'Is it *safe*?' Expediency asks the question, 'Is it *politic*?' Vanity asks the question, 'Is it *popular*?' But, conscience asks the question, '***Is it right?***' And there comes a time when one must take a position that is neither safe, nor politic, nor popular, but one must take it because one's conscience tells one that ***it is right.***"

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*"Mercy for the guilty is cruelty to the innocent."*

---Adam Smith

*"It's amazing how much panic one honest man can spread among a multitude of hypocrites."*

---Thomas Sowell

On Sat, Jun 1, 2024 at 10:23 PM kurt benshoof <[kurtbenshoof@gmail.com](mailto:kurtbenshoof@gmail.com)> wrote:  
Happy Saturday!

Please see the attached Motion for Entry of Default by Moshe Admon, Appendices, and [proposed] Order of Entry of Default, e-filed today. (Dkt. #225)

Maybe someone should suggest to Jeff (aka Moshe Admon) that he quickly cut-and-paste-and-file Blair's Rule 12(b)(5) motion (Dkt. #209). Just trying to be helpful!

In Truth & Spirit,  
Reverend Kurt Benshoof

“Cowardice asks the question, 'Is it *safe*?' Expediency asks the question, 'Is it *politic*?' Vanity asks the question, 'Is it *popular*?' But, conscience asks the question, '***Is it right?***' And there comes a time when one must take a position that is neither safe, nor politic, nor popular, but one must take it because one's conscience tells one that ***it is right.***”

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*"Mercy for the guilty is cruelty to the innocent."*

---Adam Smith

*"It's amazing how much panic one honest man can spread among a multitude of hypocrites."*

---Thomas Sowell

On Sat, Jun 1, 2024 at 4:36 PM kurt benshoof <[kurtbenshoof@gmail.com](mailto:kurtbenshoof@gmail.com)> wrote:  
Happy Saturday!

See the attached Motion for Entry of Default by individual Defendant David Keenan. (Dkt. #224)

Anyone seen my kidnapped and abused son?

In Truth & Spirit,  
Reverend Kurt Benshoof

“Cowardice asks the question, 'Is it *safe*?' Expediency asks the question, 'Is it *politic*?' Vanity asks the question, 'Is it *popular*?' But, conscience asks the question, '***Is it right?***' And there comes a time when one must take a position that is neither safe, nor politic, nor popular, but one must take it because one's conscience tells one that ***it is right.***”

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*"It's easier to build strong children than to repair broken men."*

---Frederick Douglass

*"Mercy for the guilty is cruelty to the innocent."*

---Adam Smith

*"It's amazing how much panic one honest man can spread among a multitude of hypocrites."*

---Thomas Sowell



On Sat, Jun 1, 2024 at 1:48 PM kurt benshoof <[kurtbenshoof@gmail.com](mailto:kurtbenshoof@gmail.com)> wrote:  
Happy Saturday!

Isn't it interesting that prostitute Jessica Owen, one of the narcissistic borderlines who kidnapped my son, won't file any responsive pleading to deny the facts in evidence? Is that because the evidence is irrefutable that Defendant Nathan Cliber suborned Jessica Owen's perjury and that Defendant David Keenan acted without jurisdiction to enable Cliber suborning Owen's perjury and kidnapping of my son?

HINT: *Yes.*

Please see the attached Affidavit of Service to Defendant Owen (Dkt. #222) and 2nd Motion for Entry of Default by Defendant Owen.

Mr. Russ, claimed in court on February 29, 2024, before corrupt Judge Marshall Ferguson, that Jessica Owen had not been served pursuant to Fed.R.Civ.P. 4. Now I have the transcription of that lie by Mr. Russ, as well as many others. So many lies to choose from in this Theater of Corruption!

SPOILER ALERT! *Justice is coming.*

In Truth & Spirit,  
Reverend Kurt Benshoof

"Cowardice asks the question, 'Is it *safe*?' Expediency asks the question, 'Is it *politic*?' Vanity asks the question, 'Is it *popular*?' But, conscience asks the question, '**Is it right?**' And there comes a time when one must take a position that is neither safe, nor politic, nor popular, but one must take it because one's conscience tells one that **it is right.**"

---Rev. Dr. Martin Luther King, Jr.

*"It's easier to build strong children than to repair broken men."*

---Frederick Douglass

*"Mercy for the guilty is cruelty to the innocent."*

---Adam Smith

*"It's amazing how much panic one honest man can spread among a multitude of hypocrites."*

---Thomas Sowell

On Fri, May 31, 2024 at 4:38 PM kurt benshoof <[kurtbenshoof@gmail.com](mailto:kurtbenshoof@gmail.com)> wrote:

Happy Friday!

See the attached Affidavit of Service of Summons and Complaint to KING COUNTY. (Dkt. #220)

Just a reminder on 9th Cir. No. 24-3053: Responses to Petitioner's Motion for



Injunction---to enjoin Defendants from continuing to kidnap my son and maliciously prosecute me as a means of rendering criminal assistance to the perjuring whores who are kidnapping my son---is due next Friday, June 7, 2024. Hopefully someone can lend Ms. Wu a hand with her briefing, as her previous attempts in WAWD No. 2:23-cv-00751-RAJ and Ninth Circuit No. 23-35418 weren't well argued, and I have a feeling Blair Russ (Mr. Russ said he has a 10 rating on Avvo.com!) wants to avoid writing anything on behalf of his perjuring, child abusing client, Defendant Jessica R. Owen.

In Truth & Spirit,  
Reverend Kurt Benshoof

“Cowardice asks the question, 'Is it *safe*?' Expediency asks the question, 'Is it *politic*?' Vanity asks the question, 'Is it *popular*?' But, conscience asks the question, '***Is it right?***' And there comes a time when one must take a position that is neither safe, nor politic, nor popular, but one must take it because one's conscience tells one that ***it is right.***”

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*"Mercy for the guilty is cruelty to the innocent."*

---Adam Smith

*"It's amazing how much panic one honest man can spread among a multitude of hypocrites."*

---Thomas Sowell

**From:** [kurt.benshoof](#)  
**To:** [LePierre, Dallas](#); [Riedo, Catherine E](#); [AFB](#); [Michael Tracy](#); [Sarah Turner](#); [Matthew Coughlan](#); [Darren Feider](#); [Yand, James](#); [Johnson, James E.](#); [Wu, Peggy \(PAO\)](#); [Sarah Mack](#); [Blair Russ](#); [Jeff M. Admon](#); [Owen Hermesen](#); [alwaysisobella@protonmail.com](#); [solanasparks@protonmail.com](#); [katrinaoutland@gmail.com](#); [Magali Lerman](#); [J Owen](#)  
**Cc:** [Briana Gage](#)  
**Subject:** WAWD No. 2:23-cv-1392-JNW; WAWD No. 2:24-cv-00808-LK  
**Date:** Friday, June 7, 2024 2:30:18 PM  
**Attachments:** [2024-06-07 Document 231 PLAINTIFF Motion Disqualification Whitehead.pdf](#)  
[2024-06-07 Ferguson, et al., LAWSUIT.pdf](#)

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Happy Friday!

Attached is the Motion for Disqualification of Judge Whitehead (Dkt. #231), and the Complaint filed today in WAWD No. 2:24-cv-00808-LK, in which some of you are newly named defendants.

I must confess my foolishly ignorant naivete---I actually thought that some of you would eventually display the morality or intelligence to stop aiding and abetting the class A felony kidnapping and ongoing abuse of my beloved son. Silly me!

In Truth & Spirit,  
Reverend Kurt Benshoof

"Cowardice asks the question, 'Is it *safe*?' Expediency asks the question, 'Is it *politic*?' Vanity asks the question, 'Is it *popular*?' But, conscience asks the question, '***Is it right?***' And there comes a time when one must take a position that is neither safe, nor politic, nor popular, but one must take it because one's conscience tells one that ***it is right.***"  
---Rev. Dr. Martin Luther King, Jr.

*"It's easier to build strong children than to repair broken men."*  
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---Thomas Sowell

From: [kurt.benshoof](#)  
 To: [LePierre, Dallas](#); [Riedo, Catherine E](#); [AFB](#); [Michael Tracy](#); [Sarah Turner](#); [Matthew Coughlan](#); [Darren Feider](#); [Yand, James](#); [Johnson, James E.](#); [Wu, Peggy \(PAO\)](#); [Sarah Mack](#); [Jessica Skelton](#); [Sarrafan, Soheila E](#); [Blair Russ](#); [Jeff M. Admon](#); [Owen Hermesen](#); [alwaysisobella@protonmail.com](#); [solanasparks@protonmail.com](#); [Magali Lerman](#); [J Owen](#); [Narver, Gregory C](#); [david.keenan@kingcounty.gov](#); [Davison, Ann](#); [jdurkan@mac.com](#); [Briana Gage](#)  
 Subject: WAWD No. 2:23-cv--1392-JNW; Biological Weapons; Latest From the 9th Circuit  
 Date: Saturday, June 8, 2024 8:16:21 PM  
 Attachments: [AFFIDAVIT - Boyle, Francis 2024-05-27.pdf](#)

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Happy Saturday!

In case you haven't been following other cases around the country, you may wish to get up to speed on recent developments.

*Health Freedom Defense v. Carvalho*, No. 22-55908 (9th Cir. 2024) may play a prominent role in this case going forward to trial. While the case relates to the vax mandates, the underlying arguments are mostly interchangeable with the mask policies which Defendants used to violate Plaintiffs' rights, violate state laws, and violate federal laws, and perpetrate racketeering acts under 18 U.S.C. § 1962.

Something you may not have noticed was my mention of 18 U.S.C. § 175. (Dkt. #47 pg. 8, Footnote 4)

Dr. Francis Boyle, the Harvard educated law professor that drafted the 1989 Biological Weapons and Antiterrorism Act, which passed both houses of Congress unanimously, provided an affidavit stating that Covid 19 injections and mRNA nanoparticle injections violate the law he wrote: the 1989 Biological Weapons and Antiterrorism Act.

Providing an affidavit in a Florida case (Florida SC2024-0327) about two weeks ago, Dr. Boyle asserted that 'COVID 19 injections', 'COVID 19 nanoparticle injections', and 'mRNA nanoparticle injections' are biological weapons and weapons of mass destruction and violate Biological Weapons 18 USC § 175; Weapons and Firearms § 790.166 Fla. Stat. (2023). (See attached Affidavit of Dr. Francis Boyle, 2024-05-27)

Why is this relevant? In the Fall of 2021, City of Seattle, King County, and local businesses discriminated against anyone who had not been injected with a biological weapon, commonly referred to as a COVID-19 "vaccine." Not only were the "COVID-19 vaccines" not a "vaccine" under RCW 70.290/010(10) (Dkt. #47, pg. 19 ¶17; Footnote 14), and not only did *HFD v. Carvalho* hold that the COVID-19 vaccine does not effectively "prevent the spread" of COVID-19 (*Id.*, at 3)---which means there was no rational basis for implementing vax mandates to enter stores in the Fall of 2021---but the "COVID-19 vaccines" were legally **biological weapons**.

To recap, Mayor Durkan and her many co-conspirators (including Julie Kline over at Jamal Whitehead's former law firm) committed federal fraud (18 U.S.C. § 1343) to deceive, coerce, and threaten the public so that people would be injected with biological weapons. Those concerted acts may also establish "domestic terrorism" under federal law. I may have mentioned Defendants' perpetration of "domestic terrorism" in a prior lawsuit or email. I will let ya'll track back yourselves to determine if you were duly informed and chose to ignore my warnings.

**Back to *Health Freedom Defense v. Carvalho* for some quotes that may be relevant:**

LAUSD has not carried its “formidable burden” to show that it did not abandon this policy because of litigation, and thus that “no reasonable expectation remains that it will return to its old ways.” *Cf. FBI v. Fikre*, 601 U.S. 234, 241 (2024) (cleaned up). So this case is not moot. *See id.*

*Health Freedom Defense v. Carvalho*, at 3

Plaintiffs claim that the Policy interferes with their fundamental right to refuse medical treatment. Their complaint’s crux is that the COVID-19 “vaccine” is not a vaccine. “Traditional” vaccines, Plaintiffs claim, should prevent transmission or provide immunity to those who get them. But the COVID-19 vaccine does neither. At best, Plaintiffs suggest, it mitigates symptoms for someone who has gotten it and then gets COVID-19. But this makes it a medical treatment, not a vaccine.

Plaintiffs’ complaint supports these assertions with data and statements from the Centers for Disease Control and Prevention (CDC). For example, Plaintiffs claim that the CDC changed the definition of “vaccine” in September 2021, striking the word “immunity.” Thus, they argue, the CDC conceded that the COVID-19 vaccine is not a “traditional vaccine.” They also cite CDC statements that say the vaccine does not prevent transmission, and that natural immunity is superior to the vaccine.

*Health Freedom Defense v. Carvalho*, at 8-9

**Note: none of you can establish that face masks provide an overall health benefit. And, even if you got another corrupt district court judge to (temporarily) claim that face masks do provide a health benefit, you're still trapped by the fact Defendants gave me the arbitrary and capricious interchangeability option of wearing a face shield to virtue signal for acceptance by the Branch Covidians. Is it becoming clear to you why I decided---for now---to focus exclusively on the *masks*, instead of the "vaccines"? Because you have no defense for the face covering issue.**

“Judgments on the pleadings are reviewed de novo.” *George v. Pac.-CSC Work Furlough*, 91 F.3d 1227, 1229 (9th Cir. 1996). We review under the same standards as a motion to dismiss. *Gregg v. Haw., Dep’t of Pub. Safety*, 870 F.3d 883, 887 (9th Cir. 2017). So we must accept the plaintiffs’ alleged facts as true, whether “actual proof” of them is “improbable.” *Bell Atl. Corp. v. Twombly*, 550 U.S. 544, 556 (2007). If the parties provide competing but plausible explanations, the plaintiffs’ complaint survives. *Starr v. Baca*, 652 F.3d 1202, 1216 (9th Cir. 2011). Thus, we can affirm for the moving party only if there are no material and unresolved facts, and the plaintiffs’ claims fail as a matter of law. *George*, 91 F.3d at 1229.

*Health Freedom Defense v. Carvalho*, at 12

**NOTE: Your motions to dismiss are laughable, pathetic, and should be viewed with a "critical eye." Given the fact that multiple Defendants and/or attorneys have been caught red-handed committing perjury or subornation of perjury, that "critical eye" may need to become a "very suspicious eye."**

We must view any strategic moves designed to keep us from reviewing challenged conduct with a “critical eye.” See *Knox v. Serv. Emps. Int’l Union, Loc. 1000*, 567 U.S. 298, 307 (2012).

*Health Freedom Defense v. Carvalho*, at 12

The district court relied on *Jacobson* to hold that the Policy was rooted in a legitimate government interest. *Reilly*, 2022 WL 5442479, at \*5–6. But *Jacobson* does not directly control based on Plaintiffs’ allegations. In *Jacobson*, the Supreme Court balanced an individual’s liberty interest in declining an unwanted smallpox vaccine against the State’s interest in preventing disease. 197 U.S. at 38. The Court explained that the “principle of vaccination” is “to prevent the spread of smallpox.” *Id.* at 31–32. Because of this, the Court concluded that the State’s interest superseded Jacobson’s liberty interest, and the vaccine requirement was constitutional. *Id.*

*Health Freedom Defense v. Carvalho*, at 17

At this stage, we must accept Plaintiffs’ allegations that the vaccine does not prevent the spread of COVID-19 as true. *Twombly*, 550 U.S. at 556. And, because of this, *Jacobson* does not apply. LAUSD cannot get around this standard by stating that Plaintiffs’ allegations are wrong. Nor can LAUSD do so by providing facts that do not contradict Plaintiffs’ allegations. It is true that we “need not accept as true allegations that contradict matters properly subject to judicial notice.” *Sprewell v. Golden State Warriors*, 266 F.3d 979, 988 (9th Cir. 2001). But even if the materials offered by LAUSD are subject to judicial notice, they do not support rejecting Plaintiffs’ allegations. LAUSD only provides a CDC publication that says “COVID-19 vaccines are safe and effective.” But “safe and effective” for what? LAUSD implies that it is for preventing transmission of COVID-19 but does not adduce judicially noticeable facts that prove this.

We note the preliminary nature of our holding. We do not prejudge whether, on a more developed factual record, Plaintiffs’ allegations will prove true. But “[w]hether an action ‘can be dismissed on the pleadings depends on what the pleadings say.’” *Marshall Naify Revocable Tr. v. United States*, 672 F.3d 620, 625 (9th Cir. 2012) (quoting *Weisbuch v. County of Los Angeles*, 119 F.3d 778, 783 n.1 (9th Cir. 1997)). Because we thus must accept them as true, Plaintiffs have plausibly alleged that the COVID-19 vaccine does not effectively “prevent the spread” of COVID-19. Thus, *Jacobson* does not apply, and so we vacate the district court’s order of dismissal and remand.

*Health Freedom Defense v. Carvalho*, at 18-19

**NOTE: Plaintiffs are considering whether the timing is appropriate to plead the issue of biological weapons and domestic terrorism in our Second Amended Complaint.**

*All feedback welcome!*

**P.S. Did I mention that my son was kidnapped so that two perjuring, thieving whores could inject my healthy son with multiple shots of a biological weapon?**

**P.P.S. Are lying whores continuing to threaten my son with biological weapons? Should someone tell me where my son is?**

In Truth & Spirit,  
Reverend Kurt Benshoof

“Cowardice asks the question, ‘Is it *safe*?’ Expediency asks the question, ‘Is it *politic*?’ Vanity asks the question, ‘Is it *popular*?’ But, conscience asks the question, ‘*Is it right*?’ And there comes a time when one must take a position that is neither safe, nor politic, nor popular, but

one must take it because one's conscience tells one that *it is right.*”

---Rev. Dr. Martin Luther King, Jr.

*"It's easier to build strong children than to repair broken men."*

---Frederick Douglass

*"Mercy for the guilty is cruelty to the innocent."*

---Adam Smith

*"It's amazing how much panic one honest man can spread among a multitude of hypocrites."*

---Thomas Sowell

**From:** [kurt.benshoof](#)  
**To:** [Sarah Mack](#); [Jessica Skelton](#)  
**Subject:** WAWD No. 2:24-cv-00808-JHC  
**Date:** Monday, June 24, 2024 1:22:54 PM  
**Attachments:** [2024-06-24 Document 11 Notice Appearance MACK.pdf](#)

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Happy Monday!

I left Ms. Skelton a voicemail around 1200pm today, June 24, 2024. I reminded Ms. Skelton that attempting to have **any** another attorney at Pacifica Law Group represent Ms. Skelton would be a conflict of interest.

The audacity that **YOU, Ms. Mack**, would attempt to represent Ms. Skelton, given the fact you are both co-conspirators, is patently absurd.

This is my good faith request that you strike your notice of appearance. (Dkt. #11)

In Truth & Spirit,  
Reverend Kurt Benshoof

“Cowardice asks the question, 'Is it *safe*?' Expediency asks the question, 'Is it *politic*?' Vanity asks the question, 'Is it *popular*?' But, conscience asks the question, '***Is it right?***' And there comes a time when one must take a position that is neither safe, nor politic, nor popular, but one must take it because one's conscience tells one that ***it is right.***”

---Rev. Dr. Martin Luther King, Jr.

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---Frederick Douglass

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---Adam Smith

*"It's amazing how much panic one honest man can spread among a multitude of hypocrites."*

---Thomas Sowell

**From:** [kurt.benshoof](#)  
**To:** [Wu, Peggy \(PAO\)](#); [Sarah Mack](#); [Jessica Skelton](#)  
**Subject:** WAWD No. 2:24-cv-00808-JHC  
**Date:** Wednesday, June 26, 2024 8:36:22 AM

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Happy Wednesday!

My son continues to be kidnapped and abused by two narcissistic, perjuring whores: Jessica Rae Owen and Magalie Elizabeth Lerman.

David Keenan, Marshall Ferguson, Nathan Cliber, Blair Russ, Gregory Narver, and a host of other public officials and corrupt attorneys have rendered criminal assistance to the kidnapping of my son. Some continue to do so. This is unwise.

While Plaintiffs are prepared to slam the door on any cake of half-baked prevarications that Ms. Wu or Ms. Mack may have in the oven, please don't waste my time, nor the Court's. If Ms. Wu continues to appear and file documents on behalf of *individual* defendant Marshall Ferguson, and if Ms. Mack ignores her flagrant conflicts of interest by improperly appearing and filing documents on behalf of her co-conspirator, Ms. Skelton, please understand that Plaintiffs expressly reserve their right to file a Joinder and First Amended Complaint to name Ms. Wu and Ms. Mack as co-defendants in this lawsuit.

In Truth & Spirit,  
Reverend Kurt Benshoof

“Cowardice asks the question, 'Is it *safe*?' Expediency asks the question, 'Is it *politic*?' Vanity asks the question, 'Is it *popular*?' But, conscience asks the question, '*Is it right*?' And there comes a time when one must take a position that is neither safe, nor politic, nor popular, but one must take it because one's conscience tells one that *it is right*.”

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---Adam Smith

*"It's amazing how much panic one honest man can spread among a multitude of hypocrites."*

---Thomas Sowell



**From:** [kurt.benshoof](#)  
**To:** [Dawn Taylor](#)  
**Cc:** [pwu@kingcounty.gov](mailto:pwu@kingcounty.gov); [Sarah Mack](#)  
**Subject:** Re: Benshoof v. Ferguson et al: Notice of Filing of Physical Materials - Exs. 4 & 5 to Decl. of S. Mack ISO Opposition to Motion for TRO  
**Date:** Wednesday, June 26, 2024 1:01:34 PM

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Happy Wednesday!

Bravo! You continue to render criminal assistance to the class A felony kidnapping of my son, and to Ms. Skelton rendering criminal assistance to Ms. Mack, Mr. Narvre, and to the perjuring whores who are kidnapping my son.

In Truth & Spirit,  
Reverend Kurt Benshoof

“Cowardice asks the question, 'Is it *safe*?' Expediency asks the question, 'Is it *politic*?' Vanity asks the question, 'Is it *popular*?' But, conscience asks the question, '***Is it right?***' And there comes a time when one must take a position that is neither safe, nor politic, nor popular, but one must take it because one's conscience tells one that ***it is right.***”

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---Adam Smith

*"It's amazing how much panic one honest man can spread among a multitude of hypocrites."*

---Thomas Sowell

On Wed, Jun 26, 2024 at 12:55 PM Dawn Taylor <[Dawn.Taylor@pacificallawgroup.com](mailto:Dawn.Taylor@pacificallawgroup.com)> wrote:

Good afternoon.

Attached please find Exhibits 4 and 5 to the Declaration of S. Mack ISO the Opposition to Motion for Temporary Restraining Order that were filed in physical format with the Court Today.

Thank you.

Dawn M. Taylor

Assistant to Paul J. Lawrence,  
Sarah C. Johnson, Sarah S. Mack,  
Jacob A. Zuniga, W. Scott Ferron  
& Noe Merfeld



T 206.245.1700 D 206.245.1701 F 206.245.1750

1191 Second Avenue, Suite 2000, Seattle, WA 98101-3404

[dawn.taylor@pacificallawgroup.com](mailto:dawn.taylor@pacificallawgroup.com)

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**From:** [kurt.benshoof](#)  
**To:** [Sarah Mack](#); [Jessica Skelton](#); [Narver, Gregory C](#)  
**Cc:** [Blair Russ](#); [J.Owen](#); [Magali Lerman](#); [Jeff M. Admon](#); [Sarah Turner](#); [Michael Tracy](#); [solanasparksp@protonmail.com](#); [alwaysisobella@protonmail.com](#); [Wu, Peggy \(PAO\)](#)  
**Subject:** WAWD No. 2:24-cv-00808-JHC  
**Date:** Thursday, June 27, 2024 11:10:55 AM  
**Attachments:** [Exhibit 00395-00430.pdf](#)

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Happy Thursday!

The clinical presentation of narcissistic borderline personality disorder continues to manifest in every one of your filings.

I state facts, present corroborating evidence, cite state and federal laws, and cite controlling case law. You ignore the facts, deceive, and try to claim victimhood when your lies are exposed on the record for the world to see.

When you continue to engage in deceptive fraud, I graciously give you fair warning. This is called "Notice of Claim and Opportunity to Cure." It's what our courts want potential litigants to do. Why? Because our courts should be our remedy of last resort. When you attempt to play the victim, by inferential *ad hominem* and by claiming that you feel vexed when I expose your lies and crimes, you sound sophomorically desperate. Cry harder.

I've been giving you fair warning for many months now, yet you continue your pattern of gross negligence, misconduct, and criminal law violations.

I left Blair Russ a voicemail yesterday. I suggested that he run to Marshall Ferguson and cry that I'm vexing him again. Yaknow, ask for moar fraudulent sanctions under the fraudulent and void *ab initio* Order Restricting Abusive Litigation! That would be almost as funny as that time Ms. Skelton requested that Ferguson "dismiss the Mandamus Lawsuit with prejudice and extend the Vexatious Litigant Order to cover the District and its counsel." (*See* attached Ex. #00430 ¶2)

Yesterday, Ms. Mack stated, "in light of Mr. Benshoof's history of frivolous filings, as set forth below, this Court should order a stay in this matter to allow Defendant Skelton to prepare and file a motion to restrict vexatious litigation by Mr. Benshoof against the Seattle School District ("District") and its counsel, including Ms. Skelton and the undersigned attorney." (WAWD No. 2:24-cv-00808-JHC, Dkt. #17 pg. 2 ¶1)

Plaintiffs addressed this today, stating:

"Now Ms. Mack has once again stated her intent to seek immunity by reversing victim and offender, claiming that Benshoof's factual statements and relevant citations of law are frivolous and vexatious. (Dkt. #17 pg. 2 ¶1) Liars consider facts to [be] particular[ly] vexing, especially when an honest man exposes their lies by stating facts. It is axiomatic that if Defendants and their counsel would stop violating state and federal laws, they would not need to seek immunity under fraudulent pretenses." (*Id.*, Dkt. #23 pg. 2 ¶¶2-3)

RCW Title 26 is ***Domestic Relations***.

Have I been married or in a state registered domestic partnership with either of you? I don't

remember that. Have we ever been "intimate partners"? I don't have any knowledge of that either!

### **RCW 26.51.010 Findings---Intent**

"The legislature recognizes that individuals who abuse their *intimate partners* often misuse court proceedings in order to control, harass, intimidate, coerce, and/or impoverish the abused partner."

### **RCW 26.51.020 Definitions**

(1) "Abusive litigation" means litigation where the following apply:

(a)(i) The opposing parties have a current or former intimate partner relationship;

(ii) The party who is filing, initiating, advancing, or continuing the litigation has been found by a court to have committed domestic violence against the other party pursuant to: (A) An order entered under chapter [7.105](#) RCW or former chapter [26.50](#) RCW; (B) a parenting plan with restrictions based on RCW [26.09.191](#)(2)(a)(iii); or (C) a restraining order entered under chapter [26.09](#), 26.26A, or [26.26B](#) RCW, provided that the issuing court made a specific finding that the restraining order was necessary due to domestic violence; and

(iii) The litigation is being initiated, advanced, or continued primarily for the purpose of harassing, intimidating, or maintaining contact with the other party; and

*NOTE: ALL of the above are required to constitute "abusive litigation." As we have never been in a "current or former intimate partner relationship" abusive litigation CANNOT exist.*

### **RCW 26.51.030 Order Restricting Abusive Litigation---Who may request**

(1) A party to a case may request from the court an order restricting abusive litigation if the parties are *current or former intimate partners* and one party has been *found by the court to have committed domestic violence against the other party*.

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**From:** [kurt.benshoof](#)  
**To:** [Sarah Mack](#)  
**Cc:** [Jessica Skelton](#); [Narver, Gregory C](#); [Blair Russ](#); [J Owen](#); [Magali Lerman](#); [Jeff M. Admon](#); [Sarah Turner](#); [Michael Tracy](#); [solanasparks@protonmail.com](#); [alwaysisobella@protonmail.com](#); [Wu, Peggy \(PAO\)](#)  
**Subject:** Re: WAWD No. 2:24-cv-00808-JHC  
**Date:** Thursday, June 27, 2024 12:06:37 PM

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Whether you are the president of the United States or an attorney at Pacifica Law Group, you are civilly liable when you violate 18 U.S.C. §§ 241; 242 and 42 U.S.C. §§ 1983; 1985; 1986; 2000bb.

Fortuitously, recent court cases have set the precedent that NO ONE is above the law, not even ex-presidents who had ultimate authority to declassify and retain those declassified documents in their home.

On Thursday, June 27, 2024, Sarah Mack <[Sarah.Mack@pacificallawgroup.com](mailto:Sarah.Mack@pacificallawgroup.com)> wrote:

Mr. Benshoof:

Pursuant to Federal Rule of Civil Procedure 11(c)(1) this communication is our formal notification that we will be filing a Motion for Sanctions pursuant to Rule 11 and 28 U.S.C. section 1927 if you fail to withdraw your pending Complaint in Case No. 24-cv-0808-JHC in the United States District Court for the Western District of Washington. As you are aware, it is our position that private attorneys are immune from suit for performing their representative duties before the Court, and that you have promulgated this and multiple other suits for the sole purpose of harassing Defendant, her legal counsel and her clients, and to needlessly increase the cost of litigation. Defendant will be seeking a finding of vexatious litigation and an Order requiring pre-filing review before any case may be filed by you against Defendant, her legal counsel or any other lawyer at Pacifica Law Group, or her clients, including Mr. Narver. In addition, Defendant will be seeking sanctions in the form of attorney's fees and costs for the defense of this frivolous lawsuit.

The state statutes that you reference below are not applicable to the motion we will be making as Federal Rule of Civil Procedure 11, the federal statute noted above, and the associated federal case law allow for and govern our motion.

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Regards,

Sarah

**Sarah Mack**

Partner

Pronouns: she/her/hers



**T** 206.245.1700 **D** 206.602.1223 **F** 206.245.1750

1191 2<sup>nd</sup> Avenue, Suite 2000, Seattle, WA 98101-3404

[Sarah.Mack@PacificaLawGroup.com](mailto:Sarah.Mack@PacificaLawGroup.com)

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---

**From:** kurt benshoof <[kurtbenshoof@gmail.com](mailto:kurtbenshoof@gmail.com)>

**Sent:** Thursday, June 27, 2024 11:10 AM

**To:** Sarah Mack <[Sarah.Mack@pacificallawgroup.com](mailto:Sarah.Mack@pacificallawgroup.com)>; Jessica Skelton <[Jessica.Skelton@pacificallawgroup.com](mailto:Jessica.Skelton@pacificallawgroup.com)>; Narver, Gregory C <[gcnarver@seattleschools.org](mailto:gcnarver@seattleschools.org)>

**Cc:** Blair Russ <[bmr@tbr-law.com](mailto:bmr@tbr-law.com)>; J Owen <[ms.jadelicious@gmail.com](mailto:ms.jadelicious@gmail.com)>; Magali Lerman <[magalie.lerman@gmail.com](mailto:magalie.lerman@gmail.com)>; Jeff M. Admon <[jeff@admonlaw.com](mailto:jeff@admonlaw.com)>; Sarah Turner <[sturner@grsm.com](mailto:sturner@grsm.com)>; Michael Tracy <[mtracy@grsm.com](mailto:mtracy@grsm.com)>; [solanasparksp@protonmail.com](mailto:solanasparksp@protonmail.com); [alwaysisobella@protonmail.com](mailto:alwaysisobella@protonmail.com); Wu, Peggy (PAO) <[pwu@kingcounty.gov](mailto:pwu@kingcounty.gov)>

**Subject:** WAWD No. 2:24-cv-00808-JHC

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I state facts, present corroborating evidence, cite state and federal laws, and cite controlling case law. You ignore the facts, deceive, and try to claim victimhood when your lies are exposed on the record for the world to see.

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"Now Ms. Mack has once again stated her intent to seek immunity by reversing victim and offender, claiming that Benshoof's factual statements and relevant citations of law are frivolous and vexatious. (Dkt. #17 pg. 2 ¶1) Liars consider facts to [be] particular[ly] vexing, especially when an honest man exposes their lies by stating facts. It is axiomatic that if Defendants and their counsel would stop violating state and federal laws, they would not need to seek immunity under fraudulent pretenses." (*Id.*, Dkt. #23 pg. 2 ¶¶2-3)

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Have I been married or in a state registered domestic partnership with either of you? I don't remember that. Have we ever been "intimate partners"? I don't have any knowledge of that either!

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**Subject:** Re: WAWD No. 2:24-cv-00808-JHC  
**Date:** Thursday, June 27, 2024 12:29:20 PM

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Is it about time that the Seattle School Board and local news stations know what corrupt attorneys are spending public funds on?

It's quite shocking that Mr. Narver would sign off on allocating public funds to pay for corrupt attorneys to render criminal assistance to the perjuring whores who are kidnapping and abusing my son.

However, nothing surprises me anymore in this little cesspool of corruption we call Seattle. All you have to do is play victim, and you believe you can commit any crime with impunity, right?

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Subject: Re: WAWD No. 2:24-cv-00808-JHC  
Date: Thursday, June 27, 2024 3:12:31 PM

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Happy Thursday!

Thank you for the citations!

Now, why don't you all gather around and try to figure out how you can plausibly claim that anything I have filed was "frivolous" and "brought in bad faith." Stating FACTS is the opposite of frivolous, Ms. Mack. Trying to protect my son from child abusers and trying to bring criminals to justice is the **opposite** of "bad faith." It's my civic duty, and integral to my creed.

Since you can't even address the facts, let alone refute the facts, you will all cross-reference each other's laughable and evidence-free *ad hominem*. It's literally all you do.

Let me give you some examples!

1. Quote corrupt Marshall Ferguson claiming my claims in 22-2-15958-8 were frivolous, despite all of the proof of Defendants' crimes. IT MUST BE TRUE!
2. Quote Ferguson's denial of my motion for leave to petition for habeas! He said it was "frivolous and without merit." IT MUST BE TRUE!
3. Quote corrupt Jamal Whitehead revoking my IFP status for 9th Circuit No. 24-952! Whitehead said my entire appeal (DktEntry 3.1) was frivolous and without merit. IT MUST BE TRUE!!!!

All of you lying criminals are hiding like evil clowns in your circus tent echo-chamber, pretending that if you repeat the same ridiculous lies often enough, that the courts will magically believe you!

Keep lying. Keep trying. I'll make more popcorn.

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On Thu, Jun 27, 2024 at 2:52 PM Sarah Mack <[Sarah.Mack@pacificallawgroup.com](mailto:Sarah.Mack@pacificallawgroup.com)> wrote:

Hello Mr. Benshoof,

Following is the legal authority you request:

28 U.S.C. § 1927 authorizes a court to hold a party who unreasonably and vexatiously multiplies proceedings in a case liable for the other party's excess attorney's fees reasonably incurred as a result of the unnecessary proceedings. 28 U.S.C. § 1927. The Ninth Circuit Court of Appeals has extended these statutory sanctions to *pro se* litigants. *Wages v. Internal Revenue Serv.*, 915 F.2d 1230 (9th Cir. 1990) (holding that pro se litigants may be sanctioned under section 1927). Moreover, sanctions may include pre-filing restrictions to curb vexatious litigation. *De Long v. Hennessey*, 912 F.2d 1144, 1146 (9th Cir. 1990).

**Sarah Mack**

Partner

Pronouns: she/her/hers



**T** 206.245.1700 **D** 206.602.1223 **F** 206.245.1750

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[Sarah.Mack@PacificaLawGroup.com](mailto:Sarah.Mack@PacificaLawGroup.com)

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**Sent:** Thursday, June 27, 2024 2:49 PM

**To:** Sarah Mack <[Sarah.Mack@pacificalawgroup.com](mailto:Sarah.Mack@pacificalawgroup.com)>

**Cc:** Jessica Skelton <[Jessica.Skelton@pacificalawgroup.com](mailto:Jessica.Skelton@pacificalawgroup.com)>; Narver, Gregory C <[gcnarver@seattleschools.org](mailto:gcnarver@seattleschools.org)>; Blair Russ <[bmr@tbr-law.com](mailto:bmr@tbr-law.com)>; J Owen <[ms.jadelicious@gmail.com](mailto:ms.jadelicious@gmail.com)>; Magali Lerman <[magalie.lerman@gmail.com](mailto:magalie.lerman@gmail.com)>; Jeff M. Admon <[jeff@admonlaw.com](mailto:jeff@admonlaw.com)>; Sarah Turner <[sturner@grsm.com](mailto:sturner@grsm.com)>; Michael Tracy <[mtracy@grsm.com](mailto:mtracy@grsm.com)>; [solanasparks@protonmail.com](mailto:solanasparks@protonmail.com); [alwaysisobella@protonmail.com](mailto:alwaysisobella@protonmail.com); Wu, Peggy (PAO) <[pwu@kingcounty.gov](mailto:pwu@kingcounty.gov)>

**Subject:** Re: WAWD No. 2:24-cv-00808-JHC

Happy Friday!

You mentioned that you have case law to cite. 28 U.S.C. § 1927 states that "***Any attorney or other person admitted to conduct cases*** in any court of the United States or any Territory thereof who so multiplies the proceedings in any case unreasonably and vexatiously may be required by the court to satisfy personally the excess costs, expenses, and attorneys' fees reasonably incurred because of such conduct."

Obviously I'm not an "attorney." Since you have the case law, please provide the case law supporting your assertion that I qualify as a "person admitted to conduct cases" under 28 U.S.C. §1927. I've noticed that many attorneys have a custom and widespread practice of lying, so you should validate your claims.

In Truth & Spirit,

Reverend Kurt Benshoof

"Cowardice asks the question, 'Is it *safe*?' Expediency asks the question, 'Is it *politic*?' Vanity asks the question, 'Is it *popular*?' But, conscience asks the question, '***Is it right***?' And there comes a time when one must take a position that is neither safe, nor politic, nor popular, but one must take it because one's conscience tells one that ***it is right***."

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*"Mercy for the guilty is cruelty to the innocent."*

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---Thomas Sowell

On Thu, Jun 27, 2024 at 11:47 AM Sarah Mack <[Sarah.Mack@pacificallawgroup.com](mailto:Sarah.Mack@pacificallawgroup.com)> wrote:

Mr. Benshoof:

Pursuant to Federal Rule of Civil Procedure 11(c)(1) this communication is our formal notification that we will be filing a Motion for Sanctions pursuant to Rule 11 and 28 U.S.C. section 1927 if you fail to withdraw your pending Complaint in Case No. 24-cv-0808-JHC in the United States District Court for the Western District of Washington. As you are aware, it is our position that private attorneys are immune from suit for performing their representative duties before the Court, and that you have promulgated this and multiple other suits for the sole purpose of harassing Defendant, her legal counsel and her clients, and to needlessly increase the cost of litigation. Defendant will be seeking a finding of vexatious litigation and an Order requiring pre-filing review before any case may be filed by you against Defendant, her legal counsel or any other lawyer at Pacifica Law Group, or her clients, including Mr. Narver. In addition, Defendant will be seeking sanctions in the form of attorney's fees and costs for the defense of this frivolous lawsuit.

The state statutes that you reference below are not applicable to the motion we will be making as Federal Rule of Civil Procedure 11, the federal statute noted above, and the associated federal case law allow for and govern our motion.

Under Rule 11, you now have 21 days in which to withdraw your Complaint. Should you decline to take such action, we will proceed with the filing of a motion for sanctions.

Regards,

Sarah

**Sarah Mack**

Partner

Pronouns: she/her/hers



**T** 206.245.1700 **D** 206.602.1223 **F** 206.245.1750

1191 2<sup>nd</sup> Avenue, Suite 2000, Seattle, WA 98101-3404

[Sarah.Mack@PacificaLawGroup.com](mailto:Sarah.Mack@PacificaLawGroup.com)

This electronic message contains information from the law firm of Pacifica Law Group LLP. The contents may be privileged and confidential and are intended for the use of the intended addressee(s) only. If you are not an intended addressee, note that any disclosure, copying, distribution, or use of the contents of this message is prohibited. If you have received this e-mail in error, please contact me at [sarah.mack@pacificallawgroup.com](mailto:sarah.mack@pacificallawgroup.com).

---

**From:** kurt benshoof <[kurtbenshoof@gmail.com](mailto:kurtbenshoof@gmail.com)>

**Sent:** Thursday, June 27, 2024 11:10 AM

**To:** Sarah Mack <[Sarah.Mack@pacificallawgroup.com](mailto:Sarah.Mack@pacificallawgroup.com)>; Jessica Skelton <[Jessica.Skelton@pacificallawgroup.com](mailto:Jessica.Skelton@pacificallawgroup.com)>; Narver, Gregory C <[gcnarver@seattleschools.org](mailto:gcnarver@seattleschools.org)>

**Cc:** Blair Russ <[bmr@tbr-law.com](mailto:bmr@tbr-law.com)>; J Owen <[ms.jadelicious@gmail.com](mailto:ms.jadelicious@gmail.com)>; Magali Lerman <[magalie.lerman@gmail.com](mailto:magalie.lerman@gmail.com)>; Jeff M. Admon <[jeff@admonlaw.com](mailto:jeff@admonlaw.com)>; Sarah Turner <[sturner@grsm.com](mailto:sturner@grsm.com)>; Michael Tracy <[mtracy@grsm.com](mailto:mtracy@grsm.com)>; [solanasparks@protonmail.com](mailto:solanasparks@protonmail.com); [alwaysisobella@protonmail.com](mailto:alwaysisobella@protonmail.com); Wu, Peggy (PAO) <[pwu@kingcounty.gov](mailto:pwu@kingcounty.gov)>

**Subject:** WAWD No. 2:24-cv-00808-JHC

Happy Thursday!

The clinical presentation of narcissistic borderline personality disorder continues to manifest in every one of your filings.

I state facts, present corroborating evidence, cite state and federal laws, and cite controlling case law. You ignore the facts, deceive, and try to claim victimhood when your lies are exposed on the record for the world to see.

When you continue to engage in deceptive fraud, I graciously give you fair warning. This is called "Notice of Claim and Opportunity to Cure." It's what our courts want potential litigants to do. Why? Because our courts should be our remedy of last resort. When you attempt to play the victim, by inferential *ad hominem* and by claiming that you feel vexed when I expose your lies and crimes, you sound sophomorically desperate. Cry harder.

I've been giving you fair warning for many months now, yet you continue your pattern of gross negligence, misconduct, and criminal law violations.

I left Blair Russ a voicemail yesterday. I suggested that he run to Marshall Ferguson and cry that I'm vexing him again. Yaknow, ask for moar fraudulent sanctions under the fraudulent and void *ab initio* Order Restricting Abusive Litigation! That would be almost as funny as that time Ms. Skelton requested that Ferguson "dismiss the Mandamus Lawsuit with prejudice and extend the Vexatious Litigant Order to cover the District and its counsel." (See attached Ex. #00430 ¶2)

Yesterday, Ms. Mack stated, "in light of Mr. Benshoof's history of frivolous filings, as set forth below, this Court should order a stay in this matter to allow Defendant Skelton to prepare and file a motion to restrict vexatious litigation by Mr. Benshoof against the Seattle School District ("District") and its counsel, including Ms. Skelton and the undersigned attorney." (WAWD No. 2:24-cv-00808-JHC, Dkt. #17 pg. 2 ¶1)

Plaintiffs addressed this today, stating:

"Now Ms. Mack has once again stated her intent to seek immunity by reversing victim and offender, claiming that Benshoof's factual statements and relevant citations of law are frivolous and vexatious. (Dkt. #17 pg. 2 ¶1) Liars consider facts to [be] particular[ly] vexing, especially when an honest man exposes their lies by stating facts. It is axiomatic that if Defendants and their counsel would stop violating state and federal laws, they would not need to seek immunity under fraudulent pretenses." (*Id.*, Dkt. #23 pg. 2 ¶¶2-3)

RCW Title 26 is *Domestic Relations*.

Have I been married or in a state registered domestic partnership with either of you? I don't remember that. Have we ever been "intimate partners"? I don't have any knowledge of that either!

### **RCW 26.51.010 Findings---Intent**

"The legislature recognizes that individuals who abuse their *intimate partners* often misuse court proceedings in order to control, harass, intimidate, coerce, and/or impoverish the abused partner."

### **RCW 26.51.020 Definitions**

(1) "Abusive litigation" means litigation where the following apply:

(a)(i) The opposing parties have a current or former intimate partner relationship;

(ii) The party who is filing, initiating, advancing, or continuing the litigation has been found by a court to have committed domestic violence against the other party pursuant to: (A) An order entered under chapter [7.105](#) RCW or former chapter [26.50](#) RCW; (B) a parenting plan with restrictions based on RCW [26.09.191](#)(2)(a)(iii); or (C) a restraining order entered under chapter [26.09](#), 26.26A, or [26.26B](#) RCW, provided that the issuing court made a specific finding that the restraining order was necessary due to domestic violence; and

(iii) The litigation is being initiated, advanced, or continued primarily for the purpose of harassing, intimidating, or maintaining contact with the other party; and

*NOTE: ALL of the above are required to constitute "abusive litigation." As we have never been in a "current or former intimate partner relationship" abusive litigation CANNOT exist.*

### **RCW 26.51.030 Order Restricting Abusive Litigation---Who may request**

(1) A party to a case may request from the court an order restricting abusive litigation **if** the parties are **current or former intimate partners and** one party has been **found by the court to have committed domestic violence against**



***the other party:***

***NOTE: Since we haven't been intimate partners, and I have never been found by any court to have committed domestic violence against ANYONE, no one on earth may request an Order Restricting Abusive Litigation, and no court on earth is authorized to hear such a barratrous and fraudulent motion.***

### **RCW 26.51.040 Hearing---Procedure**

(1) If a party asserts that they are being subjected to abusive litigation, the court shall attempt to verify that the parties have or previously had an intimate partner relationship and that the party raising the claim of abusive litigation has been found to be a victim of domestic violence by the other party. If the court verifies that both elements are true, or is unable to verify that they are not true, the court shall set a hearing to determine whether the litigation meets the definition of abusive litigation.

(2) At the time set for the hearing on the alleged abusive civil action, the court shall hear all relevant testimony and may require any affidavits, documentary evidence, or other records the court deems necessary.

***NOTE: Ferguson simply ignored the complete absence of statutory authority. Why? Criminals who are trying to aid and abet other criminals don't CARE about the law, do they?***

**Go ahead! Continue lying and deceiving to CYA.**

***Are you being paid by Seattle Public Schools to perpetrate this fraud?!***

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“Cowardice asks the question, 'Is it *safe*?' Expediency asks the question, 'Is it *politic*?' Vanity asks the question, 'Is it *popular*?' But, conscience asks the question, '***Is it right?***' And there comes a time when one must take a position that is neither safe, nor politic, nor popular, but one must take it because one's conscience tells one that ***it is right.***”

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**From:** [kurt.benshoof](#)  
**To:** [Sarah Mack](#)  
**Cc:** [Jessica Skelton](#); [Narver, Gregory C](#); [Blair Russ](#); [J Owen](#); [Magali Lerman](#); [Jeff M. Admon](#); [Sarah Turner](#); [Michael Tracy](#); [solanasparks@protonmail.com](#); [alwaysisobella@protonmail.com](#); [Wu, Peggy \(PAO\)](#)  
**Subject:** Re: WAWD No. 2:24-cv-00808-JHC  
**Date:** Friday, June 28, 2024 11:07:22 AM  
**Attachments:** [2024-01-15 Notice of Motion for Sanctions Appendix A - B.pdf](#)  
[2024-01-16 EXHIBIT CCP 1A.pdf](#)  
[2024-01-16 EXHIBIT CCP 1B.pdf](#)  
[2024-01-16 EXHIBIT CCP 1C.pdf](#)  
[CHEVRON DEFERENCE - Loper Bright v. Raimondo, 603 U.S. No. 22-451 \(2024\).pdf](#)

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Happy Friday!

This email is primarily addressed to Ms. Mack and Ms. Skelton, but the statements apply generally to all of you.

Let's take a stroll down Memory Lane together...

Narver allocated public funds to hire Pacifica Law Group, at the behest of Cliber and Russ, to immunize Narver's violations of RCW 28A.605.030, and Narver's rendering criminal assistance to Owen's and Lerman's kidnapping of my son, Ms. Mack filed a petition for declaratory judgment ("PDJ"). WAWD No. 2:23-cv-1829-JNW.

Mack claimed that administrative FERPA orders authorized Narver to violate RCW 28A.605.030, and that administrative case law was not only controlling in U.S. District Court, but authorized Narver to violate RCW 28A.605.030 and Benshoof's rights. Typical *Chevron* deference lunacy.

Narver refused to provide the emails between himself, Cliber, and Russ. A friend of mine did a public records request in early January for those emails. To date, Seattle Public Schools has refused to provide those incriminating emails for review.

Counterclaim Plaintiffs ("CCP") gave Mack notice and opportunity to withdraw the frivolous, fraudulent, and criminal PDJ, by emails. CCP generously offered to amicably resolve all issues without litigation. Mack refused to withdraw the PDJ.

CCP sent Mack Notice of Motion for Sanctions, pursuant to FrCP 11 and FrCP 5. (See attached .pdfs)

CCP named Mack as a Counterclaim Defendant. Skelton filed Notice of Appearance to defend CCD Mack and Narver.

Benshoof filed a petition for writ of mandamus regarding Narver's continued violations of RCW 28A.605.030 in *state court*, which is the proper venue for adjudication of actual state law controversies.

Skelton laughably claimed that Ferguson's fraudulent and void *ab initio* Order Restricting Abusive Litigation ("ORAL") covered Seattle Public Schools and Gregory Narver. If that wasn't absurd enough, Skelton then requested that the ORAL immunize Pacifica Law Group attorneys. Ferguson dismissed Skelton's claims that Narver and Seattle Public Schools were covered parties under the ORAL.

The Court ordered SPS to show cause why the PDJ should not be dismissed.

Benshoof phoned Mack in early June 2024. Benshoof once again offered to settle ***all controversies*** with ***all parties*** outside of court. Benshoof also contacted other attorneys and parties with the same generous offer including, but not limited to: Blair Russ, Dallas LePierre, and James Yand. As expected, all attorneys and refused refused Benshoof's offer.

Because Mack, Narver, and Skelton, continued to show no willingness to stop rendering criminal assistance to the ongoing kidnapping and abuse of A.R.W., Benshoof filed suit on June 7, 2024: WAWD No. 224-cv-00808-JHC.

Who did not even attempt to refute Plaintiffs' TRO (Dkt. #12) and Ex. ##00001-00394?

- The Department of Justice
- The City of Seattle
- Blair Russ (attorney of kidnapper Owen)
- Jessica Owen (kidnapper)
- Jeff Admon (attorney of kidnapper Lerman)
- Magalie Lerman (kidnapper)
- Michael Tracy (Covering up Cliber's subornation of Owen's perjury)
- Sarah Turner (Covering up Cliber's subornation of Owen's perjury)

The two Oppositions that were filed on behalf of Ferguson and Skelton were pathetically disingenuous. In typical fashion, both Mack and Wu attempted to ignore all of the perjury, subornation of perjury, absence of jurisdiction, and fraud. How? By tautologically pointing to the orders issued by David Keenan ***without jurisdiction*** on October 21, 2022, and the ORAL and Contempt Order issued by Ferguson ***without jurisdiction***. Have you all been eating apples from the Fruits of the Poisonous Tree orchard?

Because none of you can refute the facts and controlling law, you resort to childish *ad hominem*, as if this is 5th grade.

"Mr. Benshoof's complaints are ***frivolous!***" He's ***vexing*** us, your honor!" His facts and citations of law are impossible to refute, so we're going to claim he is ***maliciously*** stating facts!!!

I honestly don't understand why you haven't all crawled under the nearest rock in utter embarrassment for the nonsense you have all been attempting for months on end. If you're going to be criminals who knowingly and willfully perpetuate the abuse and kidnapping of my son, couldn't you at least retain a modicum of professionalism and dignity? It's cringey--***-really cringey.***

So, give it your best shot if you want to seek sanctions and a vexatious order. Just try to remember to contradistinguish "frivolous" from "vexatious" in your arguments.

Remember the frivolous PDJ filed by Mack? There was a reason for my bringing that up today. You should go read the opinion which came out earlier this morning, which finally nuked *Chevron* deference. (See attached pdf: *Loper Bright v. Raimondo*) If Whitehead, or whoever the PDJ is re-assigned to, does not dismiss the SPS PDJ, I can promise you that CCP will be quoting heavily from this slip opinion: *Loper Bright Enterprises, v. Raimondo*,

*Secretary of Commerce*, 603 U.S. No. 22-451 (June 28, 2024) Any attorney who claims that an administrative FERPA hearing can be used to violate RCW 28A.605.030 should have their BAR license suspended for gross negligence---at a *minimum*.

***Have a great weekend!***

In Truth & Spirit,  
Reverend Kurt Benshoof

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Partner

Pronouns: she/her/hers



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1191 2<sup>nd</sup> Avenue, Suite 2000, Seattle, WA 98101-3404

[Sarah.Mack@PacificaLawGroup.com](mailto:Sarah.Mack@PacificaLawGroup.com)

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---

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**Cc:** Blair Russ <[bmr@tbr-law.com](mailto:bmr@tbr-law.com)>; J Owen <[ms.jadelicious@gmail.com](mailto:ms.jadelicious@gmail.com)>; Magali Lerman <[magalie.lerman@gmail.com](mailto:magalie.lerman@gmail.com)>; Jeff M. Admon <[jeff@admonlaw.com](mailto:jeff@admonlaw.com)>; Sarah Turner <[sturner@grsm.com](mailto:sturner@grsm.com)>; Michael Tracy <[mtracy@grsm.com](mailto:mtracy@grsm.com)>; [solanaspark@protonmail.com](mailto:solanaspark@protonmail.com); [alwaysisobella@protonmail.com](mailto:alwaysisobella@protonmail.com); Wu, Peggy (PAO) <[pwu@kingcounty.gov](mailto:pwu@kingcounty.gov)>

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(1) A party to a case may request from the court an order restricting abusive litigation **if** the parties are **current or former intimate partners and** one party has been **found by the court to have committed domestic violence against the other party**.

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**From:** [kurt.benshoof](#)  
**To:** [LePierre, Dallas](#); [Riedo, Catherine E](#); [AFB](#); [Darren Feider](#); [Matthew Coughlan](#); [Sarah Turner](#); [Michael Tracy](#); [Sarah Mack](#); [Blair Russ](#); [Yand, James](#); [Johnson, James E.](#); [Wu, Peggy \(PAO\)](#); [Jeff M. Admon](#); [Owen Hermesen](#); [Magali Lerman](#); [J Owen](#); [Briana Gage](#); [solanasparks@protonmail.com](#); [alwaysisobella@protonmail.com](#)  
**Subject:** WAWD No. 2:23-cv-1392-JNW  
**Date:** Tuesday, July 2, 2024 4:35:08 PM  
**Attachments:** [2024-07-02 Document 246 PLAINTIFFS Notice of Objections \(Dkt 243-245\).pdf](#)  
[2024-07-02 Document 247 PLAINTIFFS Notice Appeal \(Dkt 245\).pdf](#)

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Happy Tuesday!

See the attached documents.

Some of you have received voicemail messages. Please take notice that I will be immediately moving for injunctive relief, pursuant to FRAP 8(a)(1)(C) against the malicious prosecutions by City of Seattle under SMC Nos. 656748, 656749, 669329, 671384, et al., the fraudulent ORAL and Contempt Order from Marshall "Ultra Vires" Ferguson, the fraudulent Final Restraining Order from David "Ultra Vires" Keenan, and the ongoing kidnapping and abuse of my son by perjuring, thieving whores.

You can all expect Circuit Rule 27-3 Emergency Motions for expedited hearings. Please calendar accordingly.

In Truth & Spirit,  
Reverend Kurt Benshoof

"Cowardice asks the question, 'Is it *safe*?' Expediency asks the question, 'Is it *politic*?' Vanity asks the question, 'Is it *popular*?' But, conscience asks the question, '***Is it right?***' And there comes a time when one must take a position that is neither safe, nor politic, nor popular, but one must take it because one's conscience tells one that ***it is right.***"

---Rev. Dr. Martin Luther King, Jr.

*"It's easier to build strong children than to repair broken men."*

---Frederick Douglass

*"Mercy for the guilty is cruelty to the innocent."*

---Adam Smith

*"It's amazing how much panic one honest man can spread among a multitude of hypocrites."*

---Thomas Sowell

# EXHIBIT B

Time and Cost from 1/1/23-7/10/24

**Seattle Public Schools / Benshoof Counterclaim (20186-14)**

Time

| Orig Hrs | Orig Amt  | Rev Hrs | Rev Amt   |
|----------|-----------|---------|-----------|
| 111.50   | 21,573.00 | 99.30   | 19,181.49 |

Cost

| Orig Qty | Orig Amt         | Rev Qty | Rev Amt          |
|----------|------------------|---------|------------------|
| 0.00     | 74.24            | 0.00    | 37.12            |
|          | <u>21,647.24</u> |         | <u>19,218.61</u> |

**Seattle Public Schools / Benshoof Writ (20186-15)**

Time

| Orig Hrs | Orig Amt  | Rev Hrs | Rev Amt   |
|----------|-----------|---------|-----------|
| 69.00    | 27,046.00 | 69.00   | 27,046.00 |

Cost

| Orig Qty | Orig Amt         | Rev Qty | Rev Amt          |
|----------|------------------|---------|------------------|
| 0.00     | 293.35           | 0.00    | 293.35           |
|          | <u>27,339.35</u> |         | <u>27,339.35</u> |

**Seattle Public Schools / Benshoof, Gage v. City of Seattle, et al (20186-16)**

Time

| Orig Hrs | Orig Amt  | Rev Hrs | Rev Amt   |
|----------|-----------|---------|-----------|
| 39.70    | 15,086.00 | 39.70   | 15,086.00 |

Cost

| Orig Qty | Orig Amt         | Rev Qty | Rev Amt          |
|----------|------------------|---------|------------------|
| 0.00     | 10.72            | 0.00    | 2.48             |
|          | <u>15,096.72</u> |         | <u>15,088.48</u> |

**Seattle Public Schools / Benshoof v. Ferguson, et al. (20186-17)**

Time

| Orig Hrs | Orig Amt | Rev Hrs | Rev Amt  |
|----------|----------|---------|----------|
| 25.10    | 6,098.20 | 16.00   | 6,099.00 |

Cost

| Orig Qty | Orig Amt        | Rev Qty | Rev Amt         |
|----------|-----------------|---------|-----------------|
| 0.00     | 0.00            | 0.00    | 0.00            |
|          | <u>6,098.20</u> |         | <u>6,099.00</u> |

**Totals****70,181.51****67,745.44**

# EXHIBIT C

**From:** [kurt.benshoof](#)  
**To:** [Sarah Mack](#)  
**Cc:** [Jessica Skelton](#); [Narver, Gregory C](#); [Blair Russ](#); [J Owen](#); [Magali Lerman](#); [Jeff M. Admon](#); [Sarah Turner](#); [Michael Tracy](#); [solanasparks@protonmail.com](#); [alwaysisobella@protonmail.com](#); [Wu, Peggy \(PAO\)](#)  
**Subject:** Re: WAWD No. 2:24-cv-00808-JHC  
**Date:** Thursday, June 27, 2024 12:13:11 PM

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Happy Thursday!

In case my last email wasn't clear enough:

I DOUBLE DARE YOU

On Thursday, June 27, 2024, Sarah Mack <[Sarah.Mack@pacificallawgroup.com](mailto:Sarah.Mack@pacificallawgroup.com)> wrote:

Mr. Benshoof:

Pursuant to Federal Rule of Civil Procedure 11(c)(1) this communication is our formal notification that we will be filing a Motion for Sanctions pursuant to Rule 11 and 28 U.S.C. section 1927 if you fail to withdraw your pending Complaint in Case No. 24-cv-0808-JHC in the United States District Court for the Western District of Washington. As you are aware, it is our position that private attorneys are immune from suit for performing their representative duties before the Court, and that you have promulgated this and multiple other suits for the sole purpose of harassing Defendant, her legal counsel and her clients, and to needlessly increase the cost of litigation. Defendant will be seeking a finding of vexatious litigation and an Order requiring pre-filing review before any case may be filed by you against Defendant, her legal counsel or any other lawyer at Pacifica Law Group, or her clients, including Mr. Narver. In addition, Defendant will be seeking sanctions in the form of attorney's fees and costs for the defense of this frivolous lawsuit.

The state statutes that you reference below are not applicable to the motion we will be making as Federal Rule of Civil Procedure 11, the federal statute noted above, and the associated federal case law allow for and govern our motion.

Under Rule 11, you now have 21 days in which to withdraw your Complaint. Should you decline to take such action, we will proceed with the filing of a motion for sanctions.

Regards,

Sarah

**Sarah Mack**

Partner

Pronouns: she/her/hers



**T** 206.245.1700 **D** 206.602.1223 **F** 206.245.1750

1191 2<sup>nd</sup> Avenue, Suite 2000, Seattle, WA 98101-3404

[Sarah.Mack@PacificaLawGroup.com](mailto:Sarah.Mack@PacificaLawGroup.com)

This electronic message contains information from the law firm of Pacifica Law Group LLP. The contents may be privileged and confidential and are intended for the use of the intended addressee(s) only. If you are not an intended addressee, note that any disclosure, copying, distribution, or use of the contents of this message is prohibited. If you have received this e-mail in error, please contact me at [sarah.mack@pacificallawgroup.com](mailto:sarah.mack@pacificallawgroup.com).

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**From:** kurt benshoof <[kurtbenshoof@gmail.com](mailto:kurtbenshoof@gmail.com)>

**Sent:** Thursday, June 27, 2024 11:10 AM

**To:** Sarah Mack <[Sarah.Mack@pacificallawgroup.com](mailto:Sarah.Mack@pacificallawgroup.com)>; Jessica Skelton <[Jessica.Skelton@pacificallawgroup.com](mailto:Jessica.Skelton@pacificallawgroup.com)>; Narver, Gregory C <[gcnarver@seattleschools.org](mailto:gcnarver@seattleschools.org)>

**Cc:** Blair Russ <[bmr@tbr-law.com](mailto:bmr@tbr-law.com)>; J Owen <[ms.jadelicious@gmail.com](mailto:ms.jadelicious@gmail.com)>; Magali Lerman <[magalie.lerman@gmail.com](mailto:magalie.lerman@gmail.com)>; Jeff M. Admon <[jeff@admonlaw.com](mailto:jeff@admonlaw.com)>; Sarah Turner <[sturner@grsm.com](mailto:sturner@grsm.com)>; Michael Tracy <[mtracy@grsm.com](mailto:mtracy@grsm.com)>; [solanaspark@protonmail.com](mailto:solanaspark@protonmail.com); [alwaysisobella@protonmail.com](mailto:alwaysisobella@protonmail.com); Wu, Peggy (PAO) <[pwu@kingcounty.gov](mailto:pwu@kingcounty.gov)>

**Subject:** WAWD No. 2:24-cv-00808-JHC

Happy Thursday!

The clinical presentation of narcissistic borderline personality disorder continues to manifest in every one of your filings.

I state facts, present corroborating evidence, cite state and federal laws, and cite controlling case law. You ignore the facts, deceive, and try to claim victimhood when your lies are exposed on the record for the world to see.



When you continue to engage in deceptive fraud, I graciously give you fair warning. This is called "Notice of Claim and Opportunity to Cure." It's what our courts want potential litigants to do. Why? Because our courts should be our remedy of last resort. When you attempt to play the victim, by inferential *ad hominem* and by claiming that you feel vexed when I expose your lies and crimes, you sound sophomorically desperate. Cry harder.

I've been giving you fair warning for many months now, yet you continue your pattern of gross negligence, misconduct, and criminal law violations.

I left Blair Russ a voicemail yesterday. I suggested that he run to Marshall Ferguson and cry that I'm vexing him again. Yaknow, ask for moar fraudulent sanctions under the fraudulent and void *ab initio* Order Restricting Abusive Litigation! That would be almost as funny as that time Ms. Skelton requested that Ferguson "dismiss the Mandamus Lawsuit with prejudice and extend the Vexatious Litigant Order to cover the District and its counsel." (*See* attached Ex. #00430 ¶2)

Yesterday, Ms. Mack stated, "in light of Mr. Benshoof's history of frivolous filings, as set forth below, this Court should order a stay in this matter to allow Defendant Skelton to prepare and file a motion to restrict vexatious litigation by Mr. Benshoof against the Seattle School District ("District") and its counsel, including Ms. Skelton and the undersigned attorney." (WAWD No. 2:24-cv-00808-JHC, Dkt. #17 pg. 2 ¶1)

Plaintiffs addressed this today, stating:

"Now Ms. Mack has once again stated her intent to seek immunity by reversing victim and offender, claiming that Benshoof's factual statements and relevant citations of law are frivolous and vexatious. (Dkt. #17 pg. 2 ¶1) Liars consider facts to [be] particular[ly] vexing, especially when an honest man exposes their lies by stating facts. It is axiomatic that if Defendants and their counsel would stop violating state and federal laws, they would not need to seek immunity under fraudulent pretenses." (*Id.*, Dkt. #23 pg. 2 ¶¶2-3)

RCW Title 26 is *Domestic Relations*.

Have I been married or in a state registered domestic partnership with either of you? I don't remember that. Have we ever been "intimate partners"? I don't have any knowledge of that either!

### **RCW 26.51.010 Findings---Intent**

"The legislature recognizes that individuals who abuse their **intimate partners** often misuse court proceedings in order to control, harass, intimidate, coerce, and/or impoverish the abused partner."

### **RCW 26.51.020 Definitions**

(1) "Abusive litigation" means litigation where the following apply:

(a)(i) The opposing parties have a current or former intimate partner relationship;

(ii) The party who is filing, initiating, advancing, or continuing the litigation has been found by a court to have committed domestic violence against the other party pursuant to: (A) An order entered under chapter [7.105](#) RCW or former chapter [26.50](#) RCW; (B) a parenting plan with restrictions based on RCW [26.09.191](#)(2)(a)(iii); or (C) a restraining order entered under chapter [26.09](#), 26.26A, or [26.26B](#) RCW, provided that the issuing court made a specific finding that the restraining order was necessary due to domestic violence; and

(iii) The litigation is being initiated, advanced, or continued primarily for the purpose of harassing, intimidating, or maintaining contact with the other party; and

***NOTE: ALL of the above are required to constitute "abusive litigation." As we have never been in a "current or former intimate partner relationship" abusive litigation CANNOT exist.***

### **RCW 26.51.030 Order Restricting Abusive Litigation---Who may request**

(1) A party to a case may request from the court an order restricting abusive litigation **if** the parties are **current or former intimate partners** **and** one party has been **found by the court to have committed domestic violence against the other party**.

***NOTE: Since we haven't been intimate partners, and I have never been found by any court to have committed domestic violence against ANYONE, no one on earth may request an Order Restricting Abusive Litigation, and no court on earth is authorized to hear such a barratrous and fraudulent motion.***

## **RCW 26.51.040 Hearing---Procedure**

(1) If a party asserts that they are being subjected to abusive litigation, the court shall attempt to verify that the parties have or previously had an intimate partner relationship and that the party raising the claim of abusive litigation has been found to be a victim of domestic violence by the other party. If the court verifies that both elements are true, or is unable to verify that they are not true, the court shall set a hearing to determine whether the litigation meets the definition of abusive litigation.

(2) At the time set for the hearing on the alleged abusive civil action, the court shall hear all relevant testimony and may require any affidavits, documentary evidence, or other records the court deems necessary.

*NOTE: Ferguson simply ignored the complete absence of statutory authority. Why? Criminals who are trying to aid and abet other criminals don't CARE about the law, do they?*

**Go ahead! Continue lying and deceiving to CYA.**

*Are you being paid by Seattle Public Schools to perpetrate this fraud?!*

In Truth & Spirit,

Reverend Kurt Benshoof

“Cowardice asks the question, 'Is it *safe*?' Expediency asks the question, 'Is it *politic*?' Vanity asks the question, 'Is it *popular*?' But, conscience asks the question, '*Is it right*?' And there comes a time when one must take a position that is neither safe, nor politic, nor

popular, but one must take it because one's conscience tells one that *it is right.*"

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